

MHA Privacy Notice

Related to Processing of Personal Information of MHA Supporters

Supporters includes: financial donors, fundraisers and fundraising volunteers, our advocates and individuals who support the charitable aims of the organisation.

Thank you for taking the time to read our privacy notice.

Methodist Homes (MHA) is a registered charity whose mission is to 'enable people to live later life well'. We recognise the trust you place in us when you share your personal information with us. We are committed to operating with openness, honesty and transparency. This privacy notice provides information about: the personal information that MHA collects about you as a Supporter; the ways in which your personal information may be used; and your rights.

This Privacy Notice will be updated from time to time. The latest version, and our other privacy notices, can be found on MHA's web site (www.mha.org.uk/PrivacyPolicy).

We may use additional privacy notices to supplement this notice. We will always bring any additional privacy notice to your attention.

PLEASE NOTE: We have made a change to the legal basis for communicating with you by post and telephone:

- **After 01 May 2021:** After you communicate with MHA, or complete a communication preference form, we will deem it in MHA's **Legitimate Interest** to contact you by post or telephone regarding information that we think you would expect to receive from us, e.g. advertising our services; fundraising appeals and campaigns; and how you can support us. You will always be offered the opportunity to opt-out of being provided this information.
- **Before 01 May 2021:** You may have completed a communication preference form and either given **consent** (by ticking) or **denied, or revoked consent**, (by leaving un-ticked) for MHA to contact you. This form detailed how MHA could send you marketing and fundraising information, e.g. advertising our services; fundraising appeals and campaigns; and how you can support us. You would have also selected the means by which you would like to hear from us: post, email, phone or text. Any preferences recorded before 01 May 2021 will be respected until your preferences are updated.
- **Why are we making the change?** Many people have been confused by the need to give explicit consent for communications that they expected MHA to send. In many cases this meant information that was wanted, was never received. We are therefore changing the legal basis so we can provide you information that we think you would expect to receive via post or a phone call.

We are still required to ask for explicit consent to send you marketing and fundraising information via email or text.

We will always honour your latest instructions

1. Who we are and contact details

MHA is the Data Controller for the personal data we process. MHA is a registered charity in England and Wales (No. 1083995) and Scotland (No. SC040155) and a Company limited by guarantee (No. 4043124). Our registered Office is: MHA, Epworth House, Stuart Street, Derby, DE1 2EQ.

If you have any questions about this privacy notice, or wish to exercise your rights, please contact MHA's Data Protection Officer using the contact details below.

- Email DataProtectionOfficer@mha.org.uk
- Phone 01332 221 893
- Post Data Protection Officer, MHA, Epworth House, Stuart Street, Derby, DE1 2EQ

2. Personal Information Collection

Personal information is information that can be used to identify you or is about you. Please contact us to provide an update if your personal information changes. MHA, or a company working on behalf of MHA, may request from you and process the following Personal Information (P) and Special Categories of Personal Information (S):

- | | |
|----------------------------|---|
| • Name (P) | • Debit/credit card details (P) |
| • Postal address (P) | • Whether you are a UK tax payer (P) |
| • Telephone number (P) | • Specific activity information e.g. medication (S), disabilities (S), emergency contact details (P), date of birth (P) |
| • Mobile number (P) | • Photos and videos (P) |
| • Email address (P) | |
| • Bank Account Details (P) | |

Your personal information may be collected when you:

- | | |
|----------------------------|---|
| • ask about our activities | • engage with us on social media, or |
| • make a donation to us | • order products and services (such as newsletters) |
| • register for an event | |

When you are using our secure online donation pages or text donation service, your donation is processed by a third party payment Data Processor with whom MHA has a contract.

If you use your credit or debit card to donate to us, we will ensure your payment is processed securely and in accordance with the Payment Card Industry Data Security Standard. We do not store your credit or debit card details following the completion of your transaction. Card transactions are only processed by authorised staff.

We do not usually collect special categories of personal information about you unless there is a clear reason for doing so, such as participation in an event where we need this information to ensure we provide appropriate facilities for you. We will ensure that special category personal information is only retained for the length of time necessary to fulfil the required service.

MHA processes Special Category data in accordance with its Appropriate Policy Document which can be found at www.mha.org.uk/PrivacyPolicy.

3. Processing of Personal Information & Legal Basis

MHA will use your Personal Information:

- For administration purposes - e.g. to keep a record of our relationship with you, contact you about an event you have registered for or about a donation you have made.
- To process any donations we receive from you, including the processing of Gift-Aid.
- To provide information you have requested.
- For marketing and fundraising:
 - To provide information about campaigns and appeals
 - To tell you how you can support the work of MHA.
 - To promote the work of MHA
 - To advertise our services and products we have for sale.
- To ask for your help:
- With research or surveys.
- With campaigns on issues affecting older people.
- To analyse and improve the services we offer.
- For the provision or worship service materials.
- As legally required - e.g. HM Revenue and Customs (HMRC) require us to keep financial transaction information for 7 years.

The Legal Basis for this processing is either (please see the note on page 1):

- **Legitimate Interest** – From 01 May 2021 we will communicate with you by post or telephone where it is deemed in MHA's legitimate interest, unless you have asked us not to contact you or other preferences were made before 01 May 2021. This includes sending you marketing and fundraising information, e.g. advertising our services; fundraising appeals and campaigns; and how you can support us. You have the right to opt-out of receiving this information.
- **Consent** – You have given MHA consent to send you information, by ticking a box on a form or returned letter, allowing us to contact you by email and by telephone. Before 01 May 2021 your consent also applied to postal and telephone communications. You may change your mind and revoke your consent at any time.
- **Contract** – If you enter a competition promoted by MHA the legal basis for processing your personal data is a Contract, as specified in the T&Cs of the competition.
- **Legal Obligation** – MHA has a legal obligation to process your data including:
 - When you make a donation to MHA (to comply with HMRC)
 - To update your preferences if you are registered with the Telephone Preference Service (TPS), Fundraising Preference Service (FPS) or similar opt-out service. If your preferences are registered or updated with MHA after your registration with an opt-out service, we will honour your latest instructions.

Legacy 'Pledger' or 'Intender': It is in MHA's **legitimate interest** to keep legacy pledgers and intended pledgers informed, about the work of MHA, to help them see how their legacy may be used to enable people to live later life well. We will post occasional updates and information about legacy events. You can opt-out at any time.

Promoting MHA with Photos, Videos and Quotes: We may use photos, videos and quotes: For Publicity, fundraising and advertising materials, including printed publications

- In Presentations and exhibition materials
- On Websites, social media channels and digital communications
- In News media and their associated websites and social media channels including print, television and radio

Personal Photos and Quotes: MHA will ask for **consent** to use photos, videos and quotes, in which you are a focal point, taken by staff, professionals or third party agencies on behalf of MHA. MHA may contact you as the 5 year retention period comes to an end to ask for consent to continue using the photos or video. If you are under 18 your parent or legal guardian will need to provide consent.

Group or Event Photos (excluding children): MHA may take photos during activities or events which include multiple people, where you are not the primary focus. The legal basis for taking these photos is **legitimate interest**. During such activities or events you will be informed where the photos or filming will take place allowing you to move in or out of camera shot. If a group photo is taken that includes children aged under 18 their parent or legal guardian must provide consent.

Worship Materials: The Methodist Church provides MHA a list of ministers to allow MHA, under a signed agreement, to provide worship materials and fundraising material to the churches. MHA provides this information as it has a **legitimate interest** in helping the church with such services. Ministers have the right to opt-out of receiving this information.

Your Views: MHA is continuously seeking to improve. To help us in our process we have a **legitimate interest** to seek feedback and opinions from our supporters. To this end we may occasionally ask you to: complete a survey, take part in a discussion group, or give us your views in another way. If you would rather not be invited to participate please let us know and we will record your desire to opt-out.

4. Information Sharing

MHA uses carefully selected third party service providers (Data Processors), under contract, for the purposes of completing tasks and providing services to you on our behalf (e.g. to process donations and to send mailings). They will only use your data as instructed by MHA.

MHA may share your Personal Information with another department within MHA if it is necessary to achieve the purpose for which the data was provided.

MHA will not sell or share your data with any other third parties.

5. Transfers to other countries

MHA will not transfer your Personal Information outside of the European Economic Area.

6. Securing your information

MHA takes our duty to protect your personal information and confidentiality seriously.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to your personal information is only allowed on a need to know basis. Those with access will only process your personal information as instructed and are subject to a duty of confidentiality.

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

When your personal information is shared externally it is done so securely:

- **Email:** When information is shared via email it encrypted in transit. Methods include: 1) as a password protected file, 2) using Egress or similar secure email solution, and 3) to recipients accredited by NHS Digital as secure according to their Secure Email Standard (DCB1596) to which MHA is accredited.
- **Post:** Using a sign for mail service, e.g. the Royal Mail “Sign For” service or other courier service requiring a signature on delivery.

7. Retention of Personal Information

MHA will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements. At the end of the retention period your information will either be securely and confidentially destroyed or anonymized. Anonymization is the process of removing personal information from the data so that it is not possible to identify individuals from the data.

Record	Retention Time
Personal information	7 years from the last donation, if you have given a donation. 2 years since your last contact with MHA if you have not given a donation. Competition entries will be held for 12 months after the winners have been announced.
Special Categories of Personal Information	6 months after completion of the activity it was collected for.
Legacy Pledger or Intender	As a legacy pledger or intender, we will keep your details on record so we have a record of your intent.
Photos, videos and quotes	5 Years
Your views, surveys, etc	3 years

If you request to receive no further information from us your data will be stored on a suppression list to ensure that we do not contact you in future.

8. Your Rights in relation to your Personal Information

Under the Data Protection legislation you have the following rights:

- **the right to be informed** – covered by this Privacy Notice;
- **the right of access** – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used;
- **the right to rectification** – as soon as you become aware that some information is incorrect let your line manager know or inform the Data Protection Officer;
- **the right to erasure** – request the deletion or removal of personal information where there is no compelling reason for its continued processing;
- **the right to restrict processing** – you can request the we stop any processing if the information we are processing is incorrect;
- **the right to data portability** – you can request the personal information provided by yourself, be exported in to a universal format so it can be imported into another system;
- **the right to object** – to processing relating to marketing and profiling;
- **the right not to be subject to automated decision-making** including profiling.

To exercise any of these rights please contact the person to whom you provided your personal data or MHA's Data Protection Officer (contact details in section 1).

If you are unhappy with the way that MHA has processed your personal data you can raise a complaint with the Information Commissioner's Office (<http://ico.org.uk>). We would appreciate it if you could please let us know if you contact the ICO. If you feel able to contact us before you contact the ICO, we will take your concerns seriously and we promise to work with you to resolve any issues that you have (noting that we will tell you if you should refer the issue to the ICO and that we may also need to tell the ICO).