

Privacy Policy



May 2018, Sara Papworth, Director of Finance & Resources

Date for review: May 2020

Exeter Deaf Academy is committed to protecting and respecting your privacy. This policy explains how we collect and use your personal information.

We may amend this Policy from time to time so please do check back to ensure you are happy with the changes. If we make any significant changes to this policy, we will contact you to inform you of these changes. This policy was last updated on 20 March 2018.

How do we collect personal information from you?

We collect information from you when you sign up for an event, when you contact us to ask about our activities, when you make a donation to us, fundraise on our behalf or otherwise give us personal information. We may collect information from you when you use our website, for example when you enquire about supporting us, register to receive our newsletter, or make an enquiry about a young person using our services. We may also collect personal information from you over the telephone or via email, or if you send us information by post or attend an event.

What type of personal information is collected from you and why?

Personal information is information that can be used to identify you. Personal information we usually collect may include your name, address, date of birth, telephone number and email. We may ask about your tax status in the UK so that we can claim Gift Aid. If you are enquiring about your child who attends the Academy we may also ask you their name. Any donations made online are processed through third party payment processors, such as Just Giving or BT MyDonate, who specialise in the secure online capture and processing of credit/debit card transactions. They will only share your data with us if you indicate that you are happy for them to do so.

Why do we collect your personal information?

- To provide you with the services, support, products or information you have requested
- To personalise your supporter experience and keep you up to date with information about The Academy.
- To process any donation(s) we may receive from you
- For internal administration purposes (we may contact you about a donation you have made or event you have expressed an interest in)
- For internal record keeping, such as the management of feedback or complaints
- Where it is required or authorised by law

How is your information processed?

We may use the legal means of Legitimate Interest to process your data. Where consent is required under GDPR or E-privacy laws we will ensure we gain consent prior to any data processing.

We want to send you the most relevant information about us. That's why we may supplement or add to the information we hold about you with information that is available through public sources and social media and third parties. This allows us to promote opportunities to get involved with The Academy that we believe are appropriate and you are most likely to be interested in.

We may conduct research into current or potential high net worth donors, Trustees of grant-making Trusts, partners or volunteers, either on an anonymous or identifiable basis in order to better understand who our supporters and potential supporters are and to continually strive to make our fundraising efforts as relevant and effective as possible. We generally refer to these research activities as '**Profiling**'.

Please click here for information about how we use data for profiling and research purposes which enables us to fundraise effectively and efficiently” [[<<Link to Profiling section at end of this doc>>](#)]

Who has access to the information you provide?

Occasionally we may share your information with our trusted partners in order to deliver the service you requested. For example, sharing your details with third party event organisers when you have registered to take part in an event for Exeter Deaf Academy. All of our partners work under Data Protection Law and are trusted to handle your data within these legal parameters. We may also share your information with a third party if required to do so by law (for example to the police or a government body). If we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

How do we use cookies?

Cookies are text files placed on your computer which are used for the operation of the site and for standard internet log in information, such as Google Analytics. This information is used to compile statistical reports about website activity but it does not in any way identify you as an individual.

For further information about cookies, or to set your browser not to accept cookies, visit www.aboutcookies.org or www.allaboutcookies.org Please note that if you change your settings you may not be able to access the full functionality of our website.

Links on our website

The Academy website may include links to other sites, not owned or managed by us. We cannot be held responsible for the privacy of information collected by these websites and you should check their individual privacy policies.

How secure is my information?

Exeter Deaf Academy take the security of your personal information very seriously. We adhere to the requirements of the Data Protection Act 1998 and are registered on the Data Protection Register run by the Information Commissioner’s Office; registration number Z72279006.

We use appropriate technical and organisational processes to ensure that your information is kept secure against unauthorised access or disclosure. We limit staff access to such information on a need to know basis and take measures to ensure that staff only use information for authorised purposes in accordance with our privacy policy.

We use security features to prevent unauthorised access to your personal information. However, no information shared over the internet can be 100% secure, so we cannot guarantee the security of any information you transmit to us and you share your information at your own risk.

How long will we keep your information for?

We will hold your personal information for as long as is appropriate for the activity that you are supporting, for example, participating in a campaign, taking part in events or making a donation to support our work. We are legally required to hold some personal information to fulfil statutory obligations, for example, the processing of Gift Aid or to keep records of financial transactions.

We will also hold personal details so that we can respect your preferences for being contacted by us.

We will retain information as set out below:

- Donations you have made to us – If you have made a donation to us, or sponsored someone raising funds for us and given us your details, we will keep your information for 6 years since the date of your last donation.
- Gifts in Your Will – if you have indicated that you would like to leave us a Gift in Your Will, we will retain information until 6 years after the gift is received.
- Volunteering – we will keep your details for 2 years after you last volunteered, or last contacted us or spoke to us about volunteering.
- Contacting us – if you make an enquiry to the fundraising team, participate in an event for us, or ask us about fundraising or holding an event for us, we will keep your details on file for 2 years after your last communication.

Keeping in touch

If you sign up to receive our fundraising and marketing communications, you will receive communications from us for 3 years, unless you choose to unsubscribe. If during that period, you actively engage with the Academy, we will continue to send you information on a rolling basis, unless you unsubscribe, or unless we do not hear from you for a period of 3 years. Positive engagement with the Academy could include:

- Making a donation to the Academy (including regular gifts)
- Enquiring about raising funds for the Academy
- Participating in a fundraising event
- Volunteering
- Emails, phone calls or communications with the fundraising team which indicate a positive interest in supporting the Academy

If you have provided us with your postal address, we may send you information about our work and how you can support Exeter Deaf Academy by mail, unless you have told us that you would prefer not to receive information from us in this way.

We will only contact you about our work and how you can support the Academy by phone, email or text message, if you have agreed for us to contact you in this way.

Whenever we collect personal information from you, you have a choice about whether you wish to receive any further marketing information about the vital support we provide for deaf young people.

You can update your marketing and communications preferences at any time by contacting fundraising@exeterdeafacademy.ac.uk or calling 01392 267019.

Sensitive information

You may provide us with information that is defined as sensitive personal information. This includes information relating to your health, religion or political preferences. For example, we may need to know information about your health or access requirements in order to support you to take part in an event. If we request, use or store this information, we will always explain why we are collecting this kind of information, and we will always ask for your consent to hold or use this data.

Protecting children's information

The safety of children is very important to us. Children and young people under the age of 18 should always ask for their parent or guardians permission before providing any personal information to us.

Complaints

If you wish to make a complaint about any aspect of how we are handling your data, please contact Sara Papworth, Data Controller at 50 Topsham Road, Exeter, Devon, EX2 4NF.

You can also make a complaint to the supervisory authority in the UK, the Information Commissioner's Office, at www.ico.org.uk

Your Information

You have the right to request a copy of the information we hold about you. If you would like a copy of some, or all, of your personal information, please email fundraising@exeterdeafacademy.ac.uk or write to us at the following address: Exeter Deaf Academy, 50 Topsham Road, Exeter, EX2 4NF

We want to make sure the information we hold about you is accurate and up to date. You may ask us to correct, update or remove details we hold about you.

Contact Us

Any questions regarding this policy should be directed to our Data Protection Officer, Sara Papworth at spapworth@exeterdeafacademy.ac.uk Alternatively, you can contact us by telephone on: 01392 267023 or in person at: Exeter Royal Academy for Deaf Education, 50 Topsham Road, Exeter, Devon EX2 4NF.

Thank you for your interest in Exeter Deaf Academy

Profiling

We conduct Profiling to support a number of our activities as a charity. We use the Legitimate Interest basis for processing information on potential supporters and current donors and seek consent at the earliest opportunity to conduct research from those that we are in touch with. We only use Profile data internally for the purposes of our own fundraising. The research enables us to:

(a) ensure that our campaigns, events and other fundraising communications are targeted in the most effective way possible and to the people who are most likely to be interested in them;

(b) determine whether or not certain individuals may be interested in supporting us and therefore may be interested in being approached as a supporter, either individually as a major donor or through their grant making trust.

(c) ensure that we have reasonable knowledge of who major supporters or prospective donors may be and, in compliance with ethical and regulatory responsibilities, carry out due diligence checks to minimise the risk of our charity suffering unnecessary harm or reputational damage.

(d) meet our supporters expectations; our high level donors expect us to have carried out research prior to contacting them or meeting with them.

We may conduct the following Profiling, using existing supporter data and/or data from publicly available sources, as outlined below.

a) Profiling Major Donors and Prospective Donors

We may carry out research to determine whether an individual may be a potential major donor. In doing this we may use additional information from third party sources such as Google and other

internet search engines, Companies House; biographies published on a corporate website and publicly available LinkedIn profiles.

The type of information we collect includes career overview, estimated gift capacity, history of giving to our charity and how the individual is connected with Exeter Deaf Academy, public information on any philanthropic activities, and a due-diligence check on any ethical concerns. We may also research public records of an individual's trusteeships and previous gifts or donations made by an individual to charity, or whether a company that the individual manages, or is a director of, has a corporate social responsibility (CSR) programme. Occasionally we may also research any key networks that the individual is publicly known to be a member of, such as on the board of a not for profit or philanthropic body, which may have relevance to our activities.

Our in-house research and data collection is only conducted using freely available public sources where an individual would in our view have reasonable expectation that their information may be read by the public, or has freely made information available in respect of their business and/or philanthropic interests. We always seek to ensure that any research or profiling is done in a way that does not unreasonably or unexpectedly intrude on an individual's privacy.

From time to time, we may engage a specialist agency to gather information from publicly available sources, including Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives. This research helps us to understand more about an individual so that we can provide them with an appropriate experience as a donor or potential donor. We will only engage specialist agencies who comply with data protection regulations.

We also use publicly available sources to carry out due diligence on donors in line with our policy on the acceptance and refusal of donations and to meet money laundering regulations.

(b) High Value Events

We may also use Profiling to produce short biographies of particular individuals where they are due to meet with one of our staff or attend an event that we may be hosting. This is to enable relevant senior staff members who are also attending the meeting or event to understand who those individuals are and what their interests or connection to the Exeter Deaf Academy may be.

You can let us know if you would prefer us not to process your information in these ways. We respect your privacy and you can contact us on fundraising@exeterdeafacademy.ac.uk or 01392 267019 to let us know.