

# Buttle UK Privacy Policy: How we use Funders, Donors and Website users' data

At Buttle UK we respect your privacy and we protect your personal information. This Privacy Policy describes how we collect and process your data when you visit our website, make donations or support us in our work. We only collect personal data from you that we need to run our charity in the way that you would expect.

## Contents

Buttle UK Privacy Policy: How we use Funders, Donors and Website users' data .....	1
Who we are.....	2
The data we collect about you.....	2
1. As a visitor to our website or if you contact us via the website .....	2
2. As a donor or grant funder or if you subscribe to our newsletter.....	2
3. Aggregated Data .....	3
How we get your personal information.....	3
1. As a visitor to our website or if you contact us via the website .....	3
2. As a donor or grant funder or if you subscribe to our newsletter.....	3
Why we collect your data and how we use it.....	4
1. As a visitor to our website or if you contact us via the website .....	5
2. As a donor or grant funder or if you subscribe to our newsletter.....	6
Data sharing and third parties .....	7
How we store your personal information.....	7
Data security .....	7
Data retention and deletion .....	7
Your data protection rights.....	8
How to contact us .....	9
Changes to this privacy notice .....	9
Cookies.....	10
What is a cookie? .....	10

## Who we are

We are Buttle UK, a charity registered with the Charities Commission in England & Wales (registration number 313007) and the Office of the Scottish Charity Regulator in Scotland (registration number SC037997). We are a charitable trust and so the Trustees of Buttle UK control and are responsible for your personal data. Our address is 15 Greycoat Place, London SW1P 1SB.

## The data we collect about you

Personal information is any information that can be used to identify a living person. We currently collect and process the following information about you:

- 1. As a visitor to our website or if you contact us via the website**
  - **Contact Data** including first name, last name and email address, telephone number, residential address.
  - **Communications Data** including emails, notes of conversations, and records of conversations.
  - **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
  - **Usage Data** including information about your use of our service, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); elements you viewed or words you searched for; page response times; download errors; length of visits; interaction information (such as scrolling, clicks, and mouse-overs).
- 2. As a donor or grant funder or if you subscribe to our newsletter**
  - **Contact Data** including first name, last name and email address, telephone number, residential and business addresses.
  - **Communications Data** including emails, content submitted via website, notes of conversations and meetings, records of conversations and meetings.
  - **Financial Data** including payment or direct debit instructions, may include bank account and payment card details, billing address, gift aid details.
  - **Donation Data** including details about donations you have made to us.
  - **Marketing Data** including information about your direct marketing preferences, for example whether you have agreed to receive marketing emails or newsletters from us.

### 3. Aggregated Data

- We also collect, use and share **Aggregated Data** such as statistical or demographic data for multiple purposes.
- 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 line with this privacy notice.

## How we get your personal information

We use different methods to collect data from and about you, depending on whether you visit our website, contact us via our website, donate or subscribe to our newsletter. We also collect information indirectly, (e.g., we may conduct research on potential donors or funders from publicly available sources, or we may use tools to analyse followers on social media).

### 1. As a visitor to our website or if you contact us via the website

- **Direct interactions:** You may give us your Contact and Communications Data by submitting information on our website. This includes personal data you provide when you enquire about our charity or otherwise show an interest in the work that we do.
- **Automated technologies or interactions:** As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. You can find more information in our section on cookies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties:
  - Technical Data from analytics providers such as Google based outside the EEA who provide server monitoring tools to monitor the status of our APIs and the type and volume of queries being made to them. You can find more information in our section on cookies.

### 2. As a donor or grant funder or if you subscribe to our newsletter

- **Direct interactions:** You may give us your Contact, Communications, Financial and Donation Data by submitting information on our website or by corresponding with us by phone, post, email or otherwise. This includes personal data you provide when we are discussing and processing donations from you.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties, for example we may receive:

- Contact, Financial and Donation Data from providers of donation websites such as Beacon CRM, Committed Giving, Just Giving or Virgin Money.
- Marketing Data where you subscribe or unsubscribe from our direct marketing email communications or email newsletters using Mailchimp.
- Contact Data from publicly available sources such as Companies House and the Electoral Register.

## Why we collect your data and how we use it

We will only use your personal data when the law allows us to. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we most commonly rely on for processing your personal information are:

- Where you have given us **your consent**. You have the right to withdraw consent or **opt-out** at any time. For example, you can ask us to stop sending you marketing messages by following the opt-out links on any marketing message by unsubscribing or by contacting us.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we process your personal data for direct marketing purposes, you have the **right to object**. This right is absolute, which means we must stop processing your data when you ask us to do so. In some circumstances, you have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) but you feel that us processing this data will impact on your fundamental rights and freedoms. In some cases, we may show that we have compelling legitimate grounds to process your information and where these override your rights and freedoms.

In some circumstances we need to collect personal data because **by law**, or to process a donation. If you do not provide that data when requested, we may not be able to fulfil our role in that respect.

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. You can contact us on [privacy@buttleuk.org](mailto:privacy@buttleuk.org) for more details.

We have set out below how we plan to use your data, the type of data and the legal justification we rely on to process your data. We have identified what our legitimate interests are where appropriate.

## 1. As a visitor to our website or if you contact us via the website

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To administer our charity and manage our relationship with you.	(a) Contact (b) Communications	Necessary for our legitimate interests (to promote our charitable services to support individuals who are seriously affected by financial hardship, to answer website enquiries, to tailor our charity offerings appropriately, to keep our records updated and to study how our charity is operating)
To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Contact (b) Technical	Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a charity reorganisation or group restructuring exercise)
To deliver relevant website content and marketing messages to you.	(a) Contact (b) Usage (c) Communications (d) Technical	Necessary for our legitimate interests (to study how individuals use our website, to grow our charity and to inform our marketing strategy)
To use data analytics to improve our website, our services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Consent (we use cookies and/or other similar technologies)  Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity and to inform our marketing strategy)

## 2. As a donor or grant funder or if you subscribe to our newsletter

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To process your donation or grant and to otherwise administer our charity	(a) Contact (b) Financial (c) Donation (d) Communications	Necessary for our legitimate interests (to collect funds to provide charitable services to support individuals who are seriously affected by financial hardship)
To send you marketing material	(a) Contact (b) Marketing	<p>Consent (we will send our donors, subscribers or other interested parties, marketing communications by email about our services, we may also contact donors or potential donors by telephone to see if you are interested in supporting our charity)</p> <p>Necessary for our legitimate interests (to raise funds to provide charitable services to support individuals who are seriously affected by financial hardship)</p>
To manage our relationship with you	(a) Contact (b) Communications	Necessary for our legitimate interests (to build a relationship with you that is beneficial to the charity and the donor or grant provider, to tailor our charity offerings appropriately, to keep our records updated and to study how our charity is operating).

## Data sharing and third parties

We may share your personal data with the parties set out below for the reasons set out in the section on why we collect your data and how we use it.

- Third party IT service providers including email service providers like Mailchimp, online survey providers like Survey Monkey and cloud service providers. Blackbaud Inc provide Raiser's Edge NXT, which we use as our donor management system and Google LLC provide our Google cloud based internal operating system.

We require all third parties to keep your personal data safe and secure 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 allow them to process your personal data for specified purposes and in accordance with our instructions.

Where the data may be located outside the EEA, we ensure personal data is given a similar degree of protection as data transfers within the EEA by having contractual obligations in place with our service providers.

## How we store your personal information

### Data security

Your information is securely stored in the EEA apart from data in Raiser's Edge NXT and Google, which is stored in the US.

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

We have 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.

### Data retention and deletion

We will only keep 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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

In some circumstances you can ask us to delete your data. For specific information about our data retention policies, please contact us on [privacy@buttleuk.org](mailto:privacy@buttleuk.org).

## Your data protection rights

You have several rights under data protection law and you normally do not need to pay a fee for exercising your rights.

- 1. Your right of access (data subject access request):** You have the right to ask us for copies of your personal information and to check that we are lawfully processing it.
- 2. Your right to rectification:** You have the right to ask us to correct personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. We may need to verify the accuracy of the new data you give us.
- 3. Your right to erasure:** You have the right 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. We may not always be able to comply with your request of erasure for specific legal reasons which we will tell you, if applicable, at the time of your request.
- 4. Your right to object to processing:** You have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) but you feel that us processing this data will impact on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes, which is an absolute right so we must stop processing if you object. In some cases, we may show that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 5. Your right to restriction of processing:** You have the right 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.



- 6. Your right to data portability:** You have the right to ask us to transfer the personal information you gave us to another organisation, or to you, in certain circumstances. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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. Where we rely on legitimate interests to process your personal data, this right does not apply.

If you make a request, we have one month to respond to you. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will tell you and keep you informed.

We might ask you for 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.

To make a request, please contact us at [privacy@buttleuk.org](mailto:privacy@buttleuk.org) or phone us on 020 7828 7311.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You will also find further information about your personal data rights under the current UK General Data Protection Regulation (UK GDPR) at the ICO's website: <https://ico.org.uk/>.

## How to contact us

We do our best to keep the information we hold about you accurate and up to date. If you have any questions about your personal data that are not explained here, please feel free to contact us at [privacy@buttleuk.org](mailto:privacy@buttleuk.org).

## Changes to this privacy notice

This privacy policy was last updated on 28<sup>th</sup> April 2021.

## Cookies

Buttle UK's website uses cookies to enhance the user's experience while visiting the website. The website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their own computer or mobile device.

### What is a cookie?

A cookie is a small file saved on your device, which means our website can recognise your device as you journey through our website. The cookie can store information about your preferences or past actions.

Cookies allow websites and applications to track, save and store your preferences to present content, options or functions that are specific to you. This enables the website, through its server, to provide the users with a tailored experience within this website. They also enable us to see information like how many people use the website and which pages they prefer to visit. Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their device, they should take the necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. However, this may affect how our website functions and some pages and services may become unavailable to you.

Other cookies may be stored to your computer's hard drive by external agencies when this website uses referral links (e.g., Google and other search engines). Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

You can find out more about what internet browser cookies are and how to manage them at the [about cookies website](#).