

Buttle UK Privacy Policy: How we use referrer's 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, the referrer, apply for a grant on behalf of a grant applicant or otherwise support us in the work we do. We only collect personal data from you that we need to award grants and run our charity in the way that you would expect.

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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 referrer

- **Contact Data** including first name, last name and work email address, telephone number, organisation name and address, line manager contact information.
- **Communications Data** including emails and notes 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 Buttle's website and the Grant Management system.
- **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).
- **Marketing Data** including information about your direct marketing preferences, e.g., if you have agreed to receive general information from us about our grant-making.
- **Evaluation Data** including information you share with us when you participate in surveys and other research activities.

2. Aggregated Data

- We also collect, use and share **Aggregated Data**, for example statistical or demographic data including to monitor and evaluate the impact of our grant-making.
- 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.
- 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, correspond with us by phone, post, email, apply for a grant from us or contact us about a grant.

1. As a referrer

- **Direct interactions:** You may give us your Contact and Communications Data by submitting information on our website including personal data you provide when you register to apply for a grant from us.
- **Automated technologies or interactions:** As you interact with our website and or apply for a grant using our Grant Management system, 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.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties, for example:
 - Your manager, when serious issues arise or if we have been unable to contact you, we will contact your manager to discuss the issue.
 - Technical and Usage Data from analytics providers such as Google based outside the EEA who provide server monitoring tools for our Grant Management system.
 - Marketing Data where you subscribe or unsubscribe from our email newsletters using Mailchimp.
 - Evaluation Data when you participate in surveys using SurveyMonkey and other research activities.

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 it is **necessary for our legitimate interests (or those of a third party)** and your interests and fundamental rights do not override those interests. For example, when we need to verify your organisation and role, assess the grant application and make grants via you to the applicant.
- 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, and you can choose not to take part in surveys.

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.

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 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 referrer applying for a grant on behalf of a grant applicant

Purpose/Activity	Type of data	Lawful basis for processing
To assess and award a grant application and communicate with you and report to funders	(a) Contact (b) Communications	Necessary for our legitimate interests (to administer grants to support individuals who are seriously affected by financial hardship and crisis)
To provide household goods, services or direct financial support to grant applicants	(a) Contact (b) Communications	Necessary for our legitimate interests (to provide support to individuals who are seriously affected by financial hardship and crisis)
To administer our charity and manage our relationship with you	(a) Contact (b) Communications (c) Aggregated Data	Necessary for our legitimate interests (to promote our charitable services to support individuals who are seriously affected by financial hardship and crisis, 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, this website and the grant management system (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact (b) Communications (c) Technical (d) Usage (e) Aggregated	Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud, and to monitor/improve use of the grant management system)

To deliver relevant website content and marketing messages to you	(a) Contact (b) Communications (c) Technical (d) Usage (e) Marketing	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 grant management system, website, our services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Marketing (d) Aggregated	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity, and to monitor and improve use of the grant management system) Consent (we use cookies and/or other similar technologies on our website)
To send you general information and marketing material about our grant-making	(a) Contact (b) Marketing	Consent (we will send our subscribers or other interested parties, marketing communications by email about our grant-making activity)
To monitor and evaluate the impact of our grant-making	(a) Contact (b) Communications (c) Evaluation (d) Aggregated	Necessary for our legitimate interests (to ensure we focus on where we can have the best impact, to advocate for change on applicant behalf, to examine the effectiveness of our grant-making and to inform our marketing and fundraising activities) Consent (we will send referrers surveys or ask if they want to take part in other research activities)

Data sharing and third parties

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

- Your manager to verify your details or to discuss any serious issues.
- Payment providers to give direct financial support to applicants including cheques and prepaid cards so we may share referrer details with them, especially if referrers are administering elements of the grant.
- Companies to provide goods and service to applicants including white goods, beds, internet access or other elements of the grant so we may share referrer details to support delivery / returns or addressing issues.
- Third party IT service providers including email service providers like MailChimp, online survey providers like Survey Monkey, messaging platforms like MessageBird and cloud service providers. HCS Technologies provide our grant management system, built on several technologies including Google Cloud, Elasticsearch and Groove. Google LLC provide our Google cloud based internal office system.
- Between September 2020 to July 2021, we received funding from the National Lottery for grants made in England. Under the terms of that funding we were required to share the referrer's name, email address and organisational name with the National Lottery Community Fund. This is to allow them to monitor and evaluate grants and fulfil their reporting requirements to the Government. You can find out more about how they manage personal data [here](#).

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 transferred 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 we transfer to Google's systems, 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.

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 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.

Changes to this privacy notice

This privacy policy was last updated on 23rd September 2021.