



## Daring to Dream Privacy Notice

Daring to Dream will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- adequate, relevant, and limited to what is necessary.
- accurate and kept up to date.
- kept in a form which permits identification of data subjects for no longer than is necessary.
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

### Introduction

Daring to Dream treats privacy and confidentiality very seriously. We are a charitable incorporated organisation with relationships with fundraisers, volunteers, supporters and partners so we use personal information on a day to day basis in order to fulfil our mission to support the emotional health and well-being of patients in Wales. Our use of personal information allows us to make better decisions, fundraise more efficiently and ultimately helps us to achieve our mission.

We have developed this privacy notice in order to be as transparent as possible about the personal information that we collect and use. We comply with all aspects of the UK's data protection legislation, including the European General Data Protection Regulation (GDPR) and the UK's own legislation, including Data Protection Act 2018.

Please contact us if you have any questions or concerns about our privacy practices.

### Who we are?

In this privacy policy, "we", "us" or "our" means Daring to Dream (registered charitable incorporated organisation in England and Wales, Number 1109590).

We have appointed **Barbara Chidgey** as the dedicated data privacy manager and she can be contacted by telephone on 07989 385114 and by email on [daringtodream@learningpathways.info](mailto:daringtodream@learningpathways.info).



## **What does this notice cover?**

This policy contains important information about:

- how we collect your personal information
- the personal information that we collect and use
- the lawful bases we rely on to collect and use personal information
- why we collect and use personal information
- sharing your personal information
- when we transfer personal information outside of the EEA
- how long we keep information
- how we ensure personal information is secure and
- your privacy rights

## **How we collect information about you**

We collect information in the following ways:

- You may give us information when you sign up for one of our events, fundraise for us, donate, register as a volunteer with us or otherwise communicate with us
- When you use our website, we collect your personal information using cookies and other tracking methods
- In addition, we receive information about the type of device you are using to access our website or apps or the settings on that device, including what kind of device, what operating system, device settings and so on

Your information may be shared with us by independent organisations, including for example:

- Professional fundraising agencies
- Independent event organisers e.g. Cardiff 10K run, sites such as Just Giving or Virgin Money Giving
- Online booking sites such as tocyn.cymru or Eventbrite.



### **Social Media:**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, whatsapp or twitter, you might give us permission to access information from these services, for example when you publicly tag us in an event photo.

### **Categories of personal information that we hold**

The personal information that we collect includes:

- your name (including any preferences about how they like to be called);
- your contact details (including postal address, telephone number, email address(es), social media identity / identities
- your date of birth
- your gender
- if you volunteer for us, information necessary for us to progress these applications and assess your suitability
- information about your activities on our website and about the device you used to access these, for instance your IP address and geographical location
- Information about event and activities that you have shown interest in
- Information relating to your health (for example if you are taking part in an event for health and safety purposes)
- Information you may choose to share with us about your experience of e.g. ill health, where you have left us a legacy, any information regarding next of kin with which you may have provided us in order that we can administer this
- Information as to whether you are a tax payer in order that we can claim gift aid
- Age, sexual orientation, disability and nationality and ethnicity information for monitoring purposes
- Any other personal information that you provide to us.

Some of the personal information you may share with us falls under what is deemed as sensitive personal information. Examples of this type of data include information



about health, race, religious beliefs, political views, trade union membership, sex life or sexuality and genetic / biometric information. This information is subject to even stricter rules than ordinary personal information and you can be assured that any sensitive information you choose to give will be kept confidential and

only used in accordance with this privacy notice. In the unlikely event that we collect this type of information about you, we will seek your consent.

### **The personal data of children and vulnerable adults**

We do not collect data for children under the age of 18 years old; we provide a privacy notice to their parents / guardians and only communicate with them directly.

We take great care also with data relating to vulnerable adults.

### **The lawful basis for processing personal information**

<p><b>Legal obligation</b></p>	<p>This applies where we need to collect and use your personal information to comply with applicable laws and regulations</p>
<p><b>Legitimate interests</b></p>	<p>We may collect and use your personal information to further our legitimate business interests. We only do this where we are satisfied that your privacy rights are protected satisfactorily. We're committed to putting you in control of your data and you're free at any time to opt out from any activity we're undertaking on this legal basis.</p>
<p><b>Consent</b></p>	<p>We may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).</p>
<p><b>Public task</b></p>	<p>Although we are not a public body, we do collect and use some personal information where this is necessary to perform tasks that are in the public interests.</p>
<p><b>Vital interests</b></p>	<p>This only applies in the rare instance where we need to process personal data in order to protect someone's life.</p>



## Why do we collect and use personal information?

We collect and use personal information for the following purposes, relying on the specific lawful bases set out in the table below:

Why	Legal Bases
To provide you with products, services or information you asked for	Consent Legitimate interests
To administer your donation or support your fundraising, including processing Gift Aid	Legitimate interests Legal obligation
To keep a record of your relationship with us	Legitimate interests Legal obligation
To respond to or fulfil any requests, complaints or queries you make to us	Legitimate interests Legal obligation
To better understand how we can improve our services, products, or information by conducting analysis and market research	Legitimate interests
To manage our events	Legitimate interests Legal obligation
To send you correspondence and communicate with you, including updating your contact details (see “Keeping your information up to date” below)	Consent Legitimate interests



To undertake analysis and profiling our supporters using personal information we already hold	Legitimate interests
To administer our website(s) and to troubleshoot, perform data analysis, research, generate statistics and surveys related to our technical systems	Legitimate interests
To generate reports on our work, services and events	Legitimate interests Legal obligation
To safeguard our trustees and volunteers	Legal obligation
To monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and / or personalise information which is presented to you	Consent Legitimate interests
To audit and administer our accounts	Legal obligation
To meet our legal obligations to regulators, government and / or law enforcement bodies	Legal obligation Legitimate interests
To otherwise carry out the day-to-day operations of our organisation efficiently including managing our financial position, capability, planning, communications, corporate governance and audit	Legal obligation Legitimate interests Public interest



To train and develop our trustees and volunteers	Legal obligation Legitimate interests
To prevent and respond to actual or potential fraud or illegal activities	Legal obligation Public interest
To establish, exercise or defend our legal rights or for the purpose of legal proceedings in which we may be involved	Establish, exercise or defend legal rights

### **Sending marketing communications**

Our marketing communications include information about our work, campaigns and requests for donations or other support. (Occasionally we may include information from partner organisations or organisations who support us, in these communications).

We operate an “opt-in only” communication policy for electronic communications. This means we will only send out electronic marketing communications to those who have stated they are happy for us to do so.

We may send marketing communications to you by post or telephone as long as you have not opted-out, and we feel there is a legitimate interest in you receiving the communications.

### **Events and fundraising**

When you have asked for details of one of our events, we will send you information including, where relevant, ideas for fundraising and reminders on key information about the activity.

Where you signed up for an event with a third party (for example the Cardiff 10K) and told the event organiser that you wish to fundraise for us, we may contact you with information and support for your fundraising for that event.



## **Managing your contact preferences**

We make it easy for you to tell us how you want to communicate, in a way that suits you. Our forms have clear marketing preference questions, and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine, and you can change your preferences at any time. Just let us know when you provide your data or contact us via [daringtodream@learningpathways.info](mailto:daringtodream@learningpathways.info).

If you have decided that you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you've made and any related Gift Aid, thanking you for a donation or participation in an event, or keeping in touch with you about volunteering activities you are doing for us.

## **Sharing your personal information with third parties**

A number of third parties may have access to your personal information or we may share it or send it to them. This includes:

- If you are a legacy giver, we may share information with co-beneficiaries
- Analytics and search engine providers
- Our professional advisers
- IT service providers

We may also be required to share personal information with regulatory authorities, government agencies and law enforcement agencies. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so. We do not sell, rent or otherwise make personal information commercially available to any third party.

## **Transfers outside the European Economic Area (EEA)**

We do not send personal data outside the EEA. None of the service providers we use are based outside of the EEA.

## **Keeping your information updated**

We really appreciate it if you let us know if your contact details change.

## **How long we keep personal information**

Our policy is to not hold personal information for longer than necessary.





## **How we ensure personal information is secure:**

We are strongly committed to information security and we take reasonable and appropriate steps to protect personal information from unauthorised access, loss, misuse, alteration, or corruption.

## **Your privacy rights**

You have a number of rights in relation to your personal data which we have. Not all of the rights apply in all circumstances. If you wish to exercise any of the rights, please contact us in the ways detailed below:

- You have a right of access to the personal information we hold about you
- You have the right to ask us to correct any information we hold about you that you think is wrong or incomplete
- You have the right to object to any processing of your personal information where we are relying on a legitimate interest to do so and you think your rights and interests outweigh our own and you wish us to stop. There may be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- You have the right to object if we process your personal data for the purposes of direct marketing. If you no longer want to receive our communications, please contact us.
- You have the right to ask us to delete your information. This is also known as the right to be forgotten or to erasure. We will not always agree with this request since there may be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we can not comply with your request. You can ask us to restrict the use of your personal information while we are considering your request.
- Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you want to do so.
- You may have a right to obtain the personal information that you have given us in a format that can be easily reused and to ask us to pass this personal information on in the same format to other organisations. Please contact us to find out if this right applies to you.



## How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us in the following ways:

Name: Barbara Chidgey

Email: [daringtodream@learningpathways.info](mailto:daringtodream@learningpathways.info)

Telephone: 07989 385114

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern. [Click here](#).

## Changes to this Privacy Notice

The privacy notice was last updated September 2020. We keep this privacy notice under regular review and may change it from time to time by updating this page in order to reflect changes in the law or in our privacy practices. We could encourage you to check this privacy notice for any changes on a regular basis.

Date	Changes made	Review date
October 2020	Approved	