



PRIVACY POLICY (otherwise known as a PRIVACY NOTICE)

INTRODUCTION

Hospice Care Kenya promises to respect your privacy and any personal data you share with us, or that we may receive from other organisations, and keep it secure. This privacy policy will inform you as to how we look after your data, for what purpose we collect your data and not do anything with it which you wouldn't reasonably expect.

This privacy policy is issued on behalf of Hospice Care Kenya who is the Data controller so when we mention a "Controller", "we", "us" or "our" in this policy, we are referring to Hospice Care Kenya (the entity) who is responsible for processing your data. This entity is who you provided such personal data at the time of engaging with Hospice Care Kenya.

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

Contact Details:

If you have any questions about this privacy policy or our privacy practices, please contact our DPM in the following ways:

Full name of legal entity:	Hospice Care Kenya Ltd
Email address:	hck@hospicecarekenya.com
Postal address:	PO Box 995, Worcester, WR4 4LQ
Telephone number:	01905 418286

Changes to the privacy policy and your duty to inform us of changes.

We keep our privacy policy under regular review. This version was last updated on 26th April 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

HOW WE COLLECT PERSONAL INFORMATION

We collect information in the following ways:

- When you give it to us **DIRECTLY**. You may give us your name, address and other information in order to make a donation, sign up for one of our events, purchase our products or communicate with us.

- When you give it to us **INDIRECTLY**. Your information may be shared with us by payment processors like CAF or PayPal, fundraising sites like Just Giving or event organisers who support us. These independent third parties will only do so when you have indicated that you wish to support Hospice Care Kenya and have given your consent. You should check their Privacy Policy when you provide your information to understand how they will process your data.
- When you give permission to OTHER ORGANISATIONS to share data.
- When data is already in the public domain.

WHAT PERSONAL DATA DO WE COLLECT AND HOW DO WE USE IT

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

If you support us, for example by making a donation, or if you register to fundraise, sign up for an event or organise fundraising on our behalf, we will usually collect:

- **Identity Data** includes first name, last name, title.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details. We do not ask or collect this as a matter of course but you may provide this to us e.g. via a cheque
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

Where it is appropriate we may also ask for:

- Your date of birth
- Information relating to your health (for example if you are taking part in a high-risk sporting event). This is part of the **Special Categories of Personal Data** which includes details about your race or ethnicity, religious or philosophical beliefs, information about your health). We do not collect any information about criminal convictions and offences.
- Why you have decided to donate to us. We will never make this question mandatory, and only want to know the answer if you are comfortable telling us.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Support for your fundraising events.
- Administer any donations you make, including processing gift aid.
- Keep a record of your relationship with us.
- Ensure we know how you prefer to be contacted.
- Provide you with the information, products or services you asked for.
- Understand how we can improve our information, products and services.

- Where it is necessary for our legitimate interests (or those of a third party). Your interests and fundamental rights do not override those interests.
- We may also collect and retain your information if you send feedback about our services or make a complaint.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. In most circumstances we will use **legitimate interests** as our legal basis for processing your information. We will contact you to provide regular updates on HCK activities and to ask for donations or other support. This is known as Direct Marketing. We will make it easy for you to tell us how you want us to communicate with you in a way that suits you and include information on how to opt out when we send you marketing. You have the right to withdraw consent to marketing at any time by contacting us.

We do not sell or share personal details with third parties for the purposes of marketing. But, if we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register for such an event.

Opting out

You can ask us to stop sending you newsletters/marketing messages at any time by following the opt-out links on any marketing email sent to you or by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies on our website. Please refer to the Cookie Policy that is on the HCK website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

HOW WE KEEP YOUR DATA SAFE

We take great care to ensure that your data is kept secure at all times. All users who have access to personal information have received appropriate information governance training on a regular basis.

We have put in place appropriate security arrangements to support the privacy of your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In exceptional circumstances we may need to disclose your details if required by the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period e.g. in the event of a complaint.

In some circumstances, we will 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.

YOUR LEGAL RIGHTS TO KNOW WHAT DATA WE HOLD ABOUT YOU, HOW TO MAKE CHANGES OR ASK US TO STOP USING YOUR DATA OR TO DELETE IT.

Under the UK General Data Protection Regulation, you have the following rights regarding the processing of your data.

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

We do not carry out automated decision making or profiling.

If you wish to exercise any of the rights set out above, please contact us.

Email hck@hospicecarekenya.com or write to PO Box 995, Worcester, WR4 4LQ

If you make a request, we have one month to respond to you.

We may need to request 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.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

KEEPING YOUR INFORMATION UP TO DATE

We review all the data HCK holds on an annual basis to ensure that it is still appropriate for us to hold such information. We would really appreciate if you could let us know when your contact details change.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them. If you have any further questions please send these to hck@hospicecarekenya.com.

You can obtain further information on the guidance from the Information Commissioner at <https://ico.org.uk/for-the-public/personal-information/>

How to complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Email: hck@hospicecarekenya.com or write to us at, PO Box 995, Worcester, WT4 4LQ

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

CHANGES TO THIS POLICY

We may change this Privacy Policy from time to time and it will be reviewed every three years. If we make any significant changes in the way we treat your personal information we will make this clear on the Hospice Care Kenya website or by contacting you directly.

Date Approved: April 2024

Date to be reviewed: June 2027

Related Policies: *Data Protection Policy*

Cookie Policy

Data Retention and Disposal Policy

Photograph and Media Policy and Procedures

Disciplinary Policy

Complaints Policy