

# Supporter privacy policy



The League Against Cruel Sports (or the League, as we refer to ourselves throughout this document) is reliant on healthy relationships with our supporters. Your help is crucial in making sure we're able to protect animals persecuted in the name of 'sport'. As someone who engages with the League, your trust is really important to us, and we've put this document together to explain in a clear and transparent way how we use the information you provide us with.

In it, we'll cover the following:

- Who we are
- The reasons for why we need to collect information
- The ways in which we collect information
- The types of information we collect about our supporters
- How we use this information
- How we will not use your information
- How long we will keep your information for
- An explanation of our marketing, and your rights when it comes to us staying in touch, including any profiling and screening activity we carry out
- How we share information with suppliers and contractors working for us, and our policy on sharing information outside our organisation
- The security measures we have put in place to keep your information safe
- Our use of cookies
- Your rights when it comes to opting out, asking to see what information we hold about you and amending or erasing your details
- How to get in touch
- Updates to this policy



#### Who we are

We are the League Against Cruel Sports (the League), a registered charity in England and Wales (charity number 1095234) and Scotland (charity number SC045533). We also operate a limited company (League Against Cruel Sports (UK) Limited) – company number 02880406), a wholly owned subsidiary of the League, which we use for commercial activities such as running events and selling merchandise. Our registered address is New Sparling House, Holloway Hill, Godalming, Surrey, GU7 1QZ.

Both our charity and trading arm are registered with the ICO as data controllers. Our respective registration numbers are Z7627536 and Z5696954.

For the purposes of this policy, references to 'we', 'us' and 'the League' mean both the charity and its trading subsidiary.

#### Why we collect information

Speaking plainly, information (or data) is at the heart of what we do as an organisation. It enables us to function as a charity, in terms of collecting donations, claiming Gift Aid, administering our membership programme and keeping in touch with you about our campaigns, appeals and activities. It allows us to keep track of preferences so we know when to communicate and when not to communicate with individual supporters. We also use information to make sure that if we do have permission to communicate with you, that you're receiving the right sorts of messages in a relevant and timely way.



#### How we collect information

We collect information when you:

Make a donation to us, either by post, online (either directly or by using PayPal, JustGiving, Virgin Money Giving or Everyday Hero), over the phone or via SMS/text donation. We also collect information about you when you make a donation to us through the Charities Aid Foundation, set up a standing order or Direct Debit, or donate via payroll giving (Give As You Earn)

- Become a League member
- Respond to one of our postal mailings or emails
- Complete a campaign action online (signing a petition, for example)
- Play the League raffle or lotto, or enter a competition
- Sign up to our e-newsletter
- Make a purchase from our online shop
- Sign up to one of our events
- Register as a League fundraiser, volunteer, or join one of our supporter groups
- Agree to or enquire about leaving a legacy, an in-memory or a tribute donation
- Visit our website
- Interact with us over the phone, or on social media
- Use the Animal Crimewatch reporting service
- Interact with us in some other way

We occasionally also conduct our own research and gather information using publicly available sources.



#### The types of information we collect from you

There are a number of key pieces of information we collect from you. This, along with the reasons we collect these, is detailed in the table below.

What we collect	Why we collect it
Your name	So that we have a means to address you when we get in touch, and also to enable us to process Gift Aid claims.
Your gender	This is really useful to us as a way of understanding the demographics of our supporters.
Your address, including your postcode	In order to send you updates about our activities, unless you've told us not to, or to process Gift Aid claims.
Your date of birth	Knowing how old our supporters are helps us to tailor our communications to be more applicable and relevant where possible. This information also helps us to plan for the future, to make sure that our income is sustainable.
Your phone number	Your phone number helps us to get in touch with you with service updates, for example in the case of a failed donation.
	Unless you've told us not to, we may also use your phone number to call you so that we can keep you updated with ways that you can help our work. We will not call you if you have registered with the Telephone Preference Service, unless you've specifically told us that you're happy to receive updates from us by phone.
	It is your right to opt out of updates on our work by phone, however we may still contact you directly with service updates (for example, if we have a query about a donation you have made), as these calls do not fall within the remit of fundraising or other sorts of marketing.
	We will not text you about our work unless you have specifically asked us to.
Your email address	We may also use your email address to get in touch with you with service updates. Where you've given us permission, we may also use it to keep in touch with you about our work.
	Your email address also acts as your username to log in to our website, if you have registered.
Financial information such as your credit card number or bank details	We need this information to be able to collect donations from you. These transactions are handled securely by our partners, and we have extensive security measures in place to protect the information we hold in-house.
Your status as a UK tax payer	This is crucial for us to know if you have asked us to claim Gift Aid on your donations.
Your preferences	Respecting your rights is important to us, and we place great value in making sure that when we get in touch with you, it's in line with your expectations. As such, we take great care to be mindful of how you'd like us to communicate with you (by channel, topic or frequency) and also to log when you'd rather not hear from us. Click here for more information on your rights and opting out.
Your IP address	We use your IP address to monitor the flow of traffic around our website which helps us to administer it and keep it running smoothly. We do not link your IP address to any personally identifiable information.

## How we use information we collect from you

The main ways in which we use the information you provide to us are to process donations (including claiming Gift Aid, where you have asked that we do this) and fulfil membership requests. We will also use your information to help provide you with goods and services that you've bought or requested from us.

We may also use the information you have provided to get in touch with you about our work, unless you have specifically told us not to. Please note that we will not send you emails or text messages about our work unless you have specifically asked us to.

If you have contacted us using the Animal Crimewatch reporting service, you can choose to give information anonymously, or leave your name with a phone number or email address. Any contact details you give to us will be kept confidential. We will only contact you using these details if we need more information that could lead to bringing animal abusers to justice, or helping us work to prevent similar types of crime in the future.

## How we will not use the information we collect from you

We will never sell your data, and we will never share it with other organisations for the purposes of their own marketing. We are not involved in any data swapping schemes.

#### How long we keep information for

Our standard practice is to only hold your data for as long as it is required. This will vary depending on the activity for which the data is being used. However, we are wholly aware of our obligations under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), and we make every effort to ensure that we only hold on to your data for as long as it is required.

In terms of physical records, by charity law we are required to hold on to information related to donations (such as donation forms and correspondence) for seven years (six years from the end of the financial year it is collected), at which time it gets securely destroyed.

We also use a supporter database to keep a record of your interactions with us. This includes financial information such as donation history or nonfinancial information, like details of a telephone call to our supporter care team. This information is incredibly valuable to us for fundraising and reporting purposes, and for better understanding the variety of people who support the League, so we can better plan and position our campaigns and appeals.

Because data is such a key part of helping us to achieve our goals, we have set out the following retention schedule:

- Where you have made a financial contribution to our work, as a donation or otherwise, we will retain your information indefinitely (unless otherwise requested).
- This is also the case where you have purchased a lifetime membership, or have enquired about or pledged to leave us a legacy.

We have made this decision for two reasons – firstly because it helps us to identify the context surrounding legacy donations. Our experience dictates that legacy donations become more likely if we've received a donation from a supporter in the past, even though the legacy may come about years after a financial interaction with us. Another reason is that in our experience, it is worthwhile investing in re-engaging supporters in these groups.

Where you do not fall into one of these groups (for instance, if you have only ever signed one of our petitions) we will retain your information for a period of 10 years from your last interaction with us, after which time we will erase it from our records.

It is, of course, your right to ask that your information is erased from our records whenever you wish, but please be aware that when we do, we will lose all of your preferences, including requests to opt out from certain types of communications. See more information about your rights below.

#### Marketing, Profiling & Screening

As a charity that invests responsibly in fundraising, we operate a number of programmes to raise money from individuals. This includes sending you letters and other sorts of mail, emails, calling you on the phone and sending you text messages. The law varies depending on the channel we use to get in touch with you, but in line with our obligations according to the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications (EC Directive) Regulations 2003, we may contact you as follows:

**Post:** We send out a number of postal appeals every year focused on different elements of our work. We also send out our magazine, Protect, to give you a closer look at the work we're doing. We could also get in touch with you about the different ways you can support us, such as through our raffle, lotto or by leaving a legacy. You have the right to tell us what types of mailings you'd like to receive (for instance, if you'd prefer to receive just our postal appeals or if you'd rather not receive our Protect magazine). If you'd like to discuss your preferences, please get in touch.

At the moment we send post to a majority of our supporters (we have determined that we have a legitimate interest in doing so), except where you've specifically told us you don't want to receive post from us, or where you're signed up to the Mail Preference Service.

If you want to stop receiving postal mailings from us, you can always let us know or you can opt out through the Fundraising Preference Service.

You may receive one or two postal mailings more from the time you opt out, as we do tend to prepare these in advance to save on costs. We will aim to action your request within 3 working days of receipt, but it can take up to 28 days for you to stop receiving mailings from the time you send us your request.

**Email:** We send out a number of email alerts to keep you up to date with our work, and to let you know how you can help.

We only send out marketing emails where you have specifically consented to receive them, and you can unsubscribe at any time, either by letting us know or by clicking the unsubscribe link at the bottom of every email we send. You can also opt out through the Fundraising Preference Service.

The most effective way to opt out of receiving marketing emails is by clicking the unsubscribe link at the bottom of each message, as this is actioned instantly. When you use another method to opt out of receiving marketing emails (such as by calling us), this may take a little longer to action, although we aim to honour all opt-out requests within 3 working days of our receipt.

**Phone:** We find telephone fundraising a really effective way to connect with our supporters. If you have specifically opted-in to marketing contact by phone and provided us with your telephone number, we may occasionally call you to let you know about additional ways of supporting our work relevant to you.

You do not need to give us your express consent for us to call you about non-marketing queries. For example, a staff member from our Animal Crimewatch Team could be returning your call about suspected animal cruelty, or a member of our Supporter Care Team may contact you to make sure your donations are being processed correctly.

You can opt out of receiving fundraising phone calls by letting us know, or you can opt out through the Fundraising Preference Service.

We try to action all opt-out requests as quickly as possible but we do produce telephone calling files in advance to save on costs. We will action requests to be removed from calling lists within 3 working days, but it can take up to 28 days from the time of your request for you to stop receiving calls.

**SMS:** Where you've provided us with a mobile phone number, we may also send you text messages about our work, but only if you have specifically asked us to.

If you'd like to opt out, you can either reply to our messages with a request to opt out, let us know or opt out via the Fundraising Preference Service. Text requests to opt out are actioned instantly, otherwise we aim to action opt-out requests within 3 days of receipt.

#### **Profiling**

In order to make our messages to you more relevant, we may use your personal information to create a profile of your interests and preferences. What this means is that we could use pieces of information you've either given us directly (such as your age or location) or your behaviour (your donation history, including the amount, frequency and method through which you give, or any campaign actions you've taken, including signing petitions) to create a profile. This not only gives us an idea of who our supporters are, but also helps to make sure that when we get in touch with you or ask you to take an action on our behalf, it is done in a way which is relevant and tailored to you. Please note that we may occasionally commission insight companies or use industry-standard profiling products offered by third parties to help us do this.

This enables us to identify supporters who are likely to be able to help us either in a financial or non-financial capacity, and it's also an effective way for us to maximise the use of our marketing budget, so we're able to help more animals in need with the resources we have available to us.

We consider this one of our legitimate interests and as such have considered our position carefully to ensure that any activity is implemented in a fair and balanced way, taking into account your rights as an individual. It is your right to opt out of your information being used for profiling, and there is information on how to do this at the end of this section.

#### **Screening**

Additionally, as part of our legitimate interests, we have considered that screening is an effective way for us to ensure that we are contacting you with appropriate and relevant messages. We operate a number of different programmes to nurture support and want to make sure that when we make a request of any of our supporters, it's an appropriate one. As such, we do make use of third-party wealth screening companies who combine information we provide with publicly available information to help us determine which of our supporter programmes any particular supporter is best suited for. While this does form a crucial part of our strategy to secure voluntary income, it is your right to be able to opt out from your information being screened, and details of how to do this are at the end of this section.

#### **Publicly available information**

As part of our fundraising programme, we occasionally carry out research of our own to identify individuals in the public spotlight who may be interested in supporting the League, and also to gain additional insight into current supporters of significant public standing. This practice, known as desk research, makes use of publicly available information through sources such as published rich lists, newspapers and corporate websites, and aids us in identifying opportunities for event sponsorship, corporate partnerships and media opportunities.

## Your rights – opting out of screening or profiling

It is your right to opt out of your information being used for any sort of profiling and screening. If you would like to do this, please send a request either to **supportercare@league.org.uk** or call us on **01483 524 250**.

#### **Sharing information**

So that we are able to provide you with the high level of service we pride ourselves on, and to make the most of the resources available to us, we work with a number of contracted suppliers who on our behalf help us carry out various important tasks. This could include sending out post or making phone calls, processing and banking donations and sending out thank you letters. As a result, when you deal with us, you can expect for your information to be shared with our contracted suppliers in a safe and secure manner.

These suppliers have all entered into an agreement to handle information we supply them within a confidential and secure way in accordance with our instructions. They have all been through a vetting process and we do make interim checks to ensure that their processes remain secure and robust. These organisations will never use your details for reasons beyond the scope of our interaction with them.

At the same time, we make use of certain cloudbased systems (hosted databases, email servers and service providers) to help us provide you with an optimal supporter experience. Although it is only League personnel who use and access these systems, the information within them is securely stored off-site. The suppliers and systems we use can be based in different countries which sometimes fall outside the European Economic Area (EEA). Where this is the case, we always ensure that adequate safeguards are in place to protect your rights by way of contractual agreements with these suppliers.

#### Security

We have put extensive measures into place to protect your information, both on and offline. As an organisation, we are PCI-DSS compliant and have implemented strict policies and procedures to ensure that we handle, process, and store data in a secure way, both on and offline.

All information transmitted to us electronically is encrypted and transferred in a secure way, using industry-standard technologies. In addition to this, online card payments are handled securely by our partners, and all online payment information is stored securely by them. Our IT network is secured with a number of safeguards including firewalls and antivirus packages which are regularly updated and secured against malware and ransomware. Network passwords are regularly changed and all staff are trained in matters of data protection.

The security protocols of our contracted partners (referenced in the section above) are equally robust and are checked and monitored as part of our vetting process. More information about the security standards of our partners can be found in their privacy policies. For details of these, please get in touch.

#### **Cookies**

Cookies are small pieces of code which are downloaded to your computer or mobile device when you visit a website, allowing us to recognise your device on subsequent visits. We use cookies to monitor the status of our website and ensure that it is running efficiently, and we also use cookies to remember your preferences. Cookies are anonymous and are not linked to any personal information.

You can find out more about our use of cookies in our Cookie Policy.

#### Your rights

As a charity, we have put this policy together to give you more control when it comes to your information and how we may use it. When considering the law in this area, you are afforded certain rights in terms of viewing the information we hold about you, correcting that information if necessary, and asking us to delete it should you like it to be erased.

In addition to this, you have the right to request that we do not use information we hold about you for the purposes of screening or profiling, and you also have the right to opt-out of receiving marketing and fundraising communications.

To exercise any of your rights, please get in touch.

## Accessing the information we hold about you (Subject Access Requests)

You have the right to request a copy of the information we hold about you. This is known as a Subject Access Request.

To make a Subject Access Request, please make a request in writing, addressed to:

Supporter Care Team

League Against Cruel Sports

**New Sparling House** 

Holloway Hill

Godalming

Surrey

**GU7 1QZ** 

You can also make a request by email to:

#### supportercare@league.org.uk

We shall respond to your request within 1 month of our receipt.

For example, if we receive your request on the 30th March, the time limit starts from the next day (31st March). As there is no equivalent date in April, the League has until 30th April to comply with your request.

## Correcting the information we hold about you

It is also your right to correct the information we hold about you, for instance, if you have changed your address or phone number.

We aim to action these sorts of requests within a week of our receipt.

## Deleting the information we hold about you

You have the right to ask us to delete the information we hold about you. Whilst we are duty bound to comply with your request, this is different to opting out and means that we will erase all history of our interaction with you, as far as our legal obligations allow. We will also lose all history of your preference requests, including opt-outs and unsubscribes. This means that if you re-engage with us in the future, we will have no record of your prior preferences and may end up contacting you according to the rules we have set out in this policy.

Please note that in line with our legal obligations, we are required to hold on to all information pertaining to donations for a period of seven years (six years from the end of the financial year it was collected). Should you wish for us to erase the information we hold about you, we will happily comply whilst retaining the bare minimum of information required for us to fulfil our statutory obligations.

To ensure you are excluded from our future marketing or acquisition activities, we will keep a record of your email address on our suppression file as per guidance from the Information Commissioner's Office.

# Opting out of fundraising communications and profiling/screening

Even if you have given us your consent to receive fundraising communications, it is your right to withdraw this consent (opt-out) at any time. We aim to action requests of this kind within three working days of our receipt, although because we brief and prepare our communications in advance it can take up to 28 days from the time of your request for contact to cease.

In the same way, you have the right to object to any processing we carry out as a result of our legitimate interests, including any profiling or screening activity we either carry out directly or through one of our partners.

#### How to get in touch with us

You can get in touch with us in the following ways.

#### By post:

Supporter Care Team
League Against Cruel Sports
New Sparling House

Holloway Hill

Godalming

Surrey (UK)

**GU7 1QZ** 

By email: supportercare@league.org.uk

**By phone:** 01483 524 250

#### Updates to this policy

We may update this policy from time to time. If we make any material changes to this policy we will let you know, should we have the sufficient permissions to do so. We will at this time also make it clear on our website that we have updated our terms.

This policy was last updated on 12/06/2018. Its version number is v1.3.



#### **League Against Cruel Sports**

New Sparling House Holloway Hill Godalming GU7 1QZ

01483 524 250 supportercare@league.org.uk www.league.org.uk

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