

Privacy Notice

Controlled document

This document is uncontrolled when downloaded or printed

Reference number	WHHC7
Document type	Notice
Version	V2
Author's name & job title	Alison Rosen, Charity Chief Executive Officer
Reviewed by	WHTH Information Governance and Data Protection Officer
Review date	April 2026
Approved by	Charity Committee
Next review date	Feb 2029
Target audience	All individuals who interact with the Charity
Additional search terms (Not already in the title)	N/A
Previous document name (if different)	Privacy Statement

Contribution List

Key individuals involved in developing this version of the document

Name	Designation
Alison Rosen	Charity Chief Executive Officer
Nicola Bateman	WHTH Information Governance and Data Protection Officer

Change of History

Version	Date	Author	Reason for change
1	Feb 2025	Alison Rosen	Updated to ensure consistency with all other policies and to align with the same template.
2	April 2026	Alison Rosen	Updated to reflect wealth screening and prospect research

Abbreviations and Acronyms

Abbreviations and Acronyms	Description
GDPR	General Data Protection Regulation
ICO	Information Commissioners Officer
NHSCT	NHS Charities Together
Staff	Charity, and Philanthropy Board staff. On exception, Charity Committee staff.
Trust	West Herts Teaching Hospital
UK	United Kingdom
WHTH	West Herts Teaching Hospital

Contents

1.	Introduction	4
2.	What personal information do we collect	4
3.	How we collect personal information about you	5
4.	What we do with your personal information	5
5.	Wealth screening and prospect research	5
6.	Is information transferred outside the UK	6
7.	How do we keep your information secure and confidential	6
8.	What is our lawful basis for processing your data	6
9.	Who do we share your data with.....	8
10.	How we update your information	8
11.	How long we keep your data	8
12.	Information on children and those under 18 years of age	8
13.	Profiling and fund-raising efficiency.....	9
14.	What are your data protection rights	9
15.	How to contact us you have a complaint, a query or wish to compliment	10
16.	Monitoring & Compliance	11
17.	References	11

1. Introduction

West Herts Hospitals Charity is committed to protecting your privacy and upholding our responsibilities under the Data Protection Act 2018 and UK GDPR. We strive to ensure that any personal information we collect is handled, used, and processed in line with these regulations and all applicable data protection laws.

This Privacy Notice explains how we manage the personal information you provide to us. We may occasionally update this privacy notice, so please check this page periodically for any changes.

The new policy has been taken from NHSCT any hospital policy template and has been reviewed by West Hertfordshire Teaching Hospital Trust, Information Governance and Data Protection Officer.

Our Contact Details

We are the Data Controller for your information registered with the Information Commissioner's Officer (ICO) under registration number **Z5205111**. A Data Controller decides on why and how information is used and shared.

West Herts Hospitals Charity
Sycamore House, Watford General Hospital
WD18 0HB
07815 459037
[West Herts Hospitals Charity](#)

Data Protection Officer's contact details

Our Data Protection Officer is Nicola Bateman. She monitors our compliance with data protection laws. For queries about your personal data, contact her at <mailto:westherts.infogov@nhs.net>.

2. What personal information do we collect

Personal information is information that can be used to identify you. We collect the following information:

- Your title, name, gender, and date of birth.
- Your contact details (postal address, email, telephone number and social media contact details).
- Family and spouse/partner details, relationships too other supporters.
- Current interests and activities.
- Gift aid status and records of donations.
- Contact preferences.
- Media articles about you (including photos)
- Your IP address, location, browser type and information on how you interact on our website.
- Your credit/debit card details in line with payment card standards.
- bank account details if you set up a direct debit or standing order payment for regular donations to us.

In some limited circumstances we may collect information considered ‘special category data’. This is personal information regarding racial or ethnic origins, political opinions, religious beliefs, and health (including mental health).

3. How we collect personal information about you

We collect personal information about you in the following ways:

- **Directly from you** – You may provide us with your information when you sign up for one of our events, share your story, donate, or communicate with us in other ways. Occasionally, when you support us, your information may be processed by third-party organisations working on our behalf (such as a mailing house).
- **Indirectly from third parties** – Your information may be shared with us by independent organisations, such as fundraising platforms like eBay, JustGiving, Muchloved, Farewill and the Fundraising Foundry (the lottery). These third parties will only do so if you have expressed your wish to support us and given your consent. We recommend reviewing their privacy policies to understand how they handle your data before providing any information.
- **Through permission from other organisations** – Depending on your privacy settings and the policies of social media or messaging platforms like Facebook and Twitter, you may grant us access to certain information from your accounts or services.

4. What we do with your personal information

The personal information we collect helps us achieve our fundraising goals. If you support us, for example by donating, volunteering, registering to fundraise, or signing up for an event, we will mainly use your information to:

- Provide you with the information, activity, services, or products you have asked for.
- Provide you information about other activity, services, or products we think might interest you where you have consented to being contacted.
- Administer your donation or support you fundraising, including processing Gift Aid.
- Send you surveys for market research.
- Invite you to events.
- Keep a record of your relationship with us and record the contact we have with you.

We do not, and will never, sell or trade your data.

5. Wealth screening and prospect research

We may analyse information about our supporters to help us understand their interests and their potential ability to support our work at a higher level. This is sometimes known as “wealth screening” or “prospect research”.

To do this, we may share limited personal information (such as your name and address) with trusted third-party organisations who specialise in this type of analysis, such as Prospecting for Gold Ltd. These organisations compare our data against publicly available sources (for example, Companies House, property information, published biographies and other public records) and their own databases.

This helps us to better understand our supporters and to ensure that any fundraising approaches we make are appropriate, relevant and proportionate.

We carry out this activity on the basis of our legitimate interests as a charity to raise funds and operate effectively. We take steps to ensure that this processing is fair and does not override your rights and interests.

You have the right to object to this type of processing at any time. If you would prefer us not to use your data in this way, please contact us at westherts.hospitalscharity@nhs.net and we will respect your wishes.

6. Is information transferred outside the UK

All information we collect is stored and processed within the UK, except for data held in our donor database, Raiser's Edge (a product of Blackbaud Inc.). Blackbaud, headquartered in the United States, may transfer personal data outside the UK as necessary to fulfil its obligations to clients, where we act as the data controller.

These data transfers occur only to countries recognised by the UK Secretary of State as having adequate data protection levels or to organisations using lawful transfer mechanisms that ensure proper safeguards, such as standard contractual clauses or binding corporate rules.

7. How do we keep your information secure and confidential

We are committed to ensuring that your personal information is kept safe and secure. We use a range of measures to protect your data, including:

- **Encryption:** All electronic records are encrypted to prevent unauthorised access.
- **Access controls:** Only authorised Charity staff with a legitimate need to access your information are granted access, and this is regularly reviewed.
- **Training:** Our staff receive regular data protection training to ensure they understand their responsibilities when handling your personal information.
- **Physical security:** Paper records are stored securely, and access to these is restricted.
- **Secure transfer:** When sharing your information with other organisations, we use secure methods to ensure it remains protected.

These measures are designed to safeguard your information in compliance with data protection laws, including the UK GDPR and the Data Protection Act 2018

8. What is our lawful basis for processing your data

Under the UK General Data Protection Regulation (UK GDPR) we must have a legal reason to collect, keep and use your data. We rely on the following legal basis for processing it:

Article 6(1)(a) We have your consent - this must be freely given, specific, informed, and unambiguous.

When we rely on your "consent" to process your information, this means we only use it with your permission, and you can withdraw that permission at any time without any negative consequences. However, if you withdraw consent for receiving our news and updates through certain methods, we will no longer be able to send those to you.

With your consent, we may use your personal information to:

- Send you updates and information about our charity by email, SMS, or direct social media messages. You will always be given the opportunity to opt out of communication from any channel at any time.
- Making automated telephone calls.
- Call you on private numbers registered with the telephone preference service to ask for your support.
- Share information about your support for us.

If you agree to receive further updates from us when asked on a partner website or giving platform, that partner will pass your contact and donation information to us, along with your consent to be contacted by the method you agreed to (such as email or text message).

Article 6(1)(b) Contractual necessity the following circumstances will result in using your information for the purposes of administering a contract:

- Providing you with a ticket for an event, training course, and processing your registration for that ticket or event.
- Using your data to communicate with you in respect of grants or gifts we have made or received where that grant or gift is subject to a contract between us and you or an organisation with which you are connected.

Article 6(1)(c) Legal obligation - We have a legal obligation to process your information in the following circumstances.

- If you allow us to claim Gift Aid, we are required to keep records and share them with His Majesty's Revenue and Customs.
- We keep records for auditing and accounting purposes.
- For certain donations, we are required to conduct anti-money laundering checks.
- To comply with our legal obligations under *Charity fundraising: a guide to trustee duties (CC20)*, as well as regulation such as the Charity Commission's Know Your Donor Policy and the Fundraising Regulator's Code of Practice, we may also undertake due diligence research to assess the source of funds for donations and to ensure that we are robustly considering ethical and reputational risks to the charity.
- We comply with charity regulations to protect the charity's reputation.
- We are legally required to record details of any complaints about fundraising.

Article 6(1)(f) Legitimate interests Some of our work requires using your data, even when we don't need your consent by law. In these cases, we use "Legitimate Interests," meaning we balance our needs with your rights. If the impact on you seems too high, we'll ask for your consent. You can also ask us to stop using your data under "Legitimate Interests."

The following are some examples of instances where we process your data for our legitimate interest.

- **Direct marketing** – We will send postal marketing and fundraising requests about our charity, including how you can donate. You will always be given the opportunity on how to opt-out of receiving and further information.
- **Profiling and analysing information** – We carry out limited profiling and research to help us understand our donors and potential donors, including gathering information

from publicly available resources to give and insight into philanthropic interests and ability to support our charity.

- **Administrative purposes** – For example, if a direct debit were to cease due to a change of bank account, or to ask you to consider completing a Gift Aid form.

9. Who do we share your data with

We only share your data in this way if we have your consent, or if we are legally obliged to do so.

We may pass your data to the following organisation:

- To HMRC to claim Gift Aid
- To statutory bodies, for example the Charity Commission, or the Police, if they have obtained the relevant powers to require us to pass your data to them.

We may share your data with organisations that help us carry out our work, known as "Data Processors." These organisations work under contract with us, which means they can only use your data as instructed by us. They are not allowed to use your data for their own purposes or keep it beyond what we've authorised. Examples include companies that print letters for us or manage our secure, encrypted donor database in the cloud.

10. How we update your information

Please let us know if you move or change your contact details so we can keep our records accurate. If mail to you is returned as "moved away" or similar, we may use public sources, like the National Change of Address database, to verify and update your information.

We strive to keep your information accurate and up to date and will assume that the details you provide are correct unless we learn otherwise. If we discover any inaccuracies, we will correct them promptly.

11. How long we keep your data

We keep your personal information only as long as needed to fulfil the purpose for which it was collected, as well as to meet any legal, accounting, or reporting requirements.

Typically, we follow a set time frame based on our data retention policy, which may vary depending on the purpose of the information and any legal or contractual requirements (such as financial regulations).

In most cases, we keep personal information related to donations, campaign actions, or mailing list subscriptions for six years after your last donation or interaction with us. After this period, we will decide if we need to retain it for another six years. Once the retention period is over, your information will be securely deleted or destroyed.

If you've pledged a legacy gift, we will retain your information until the gift is received, so we can match the gift with the pledge.

12. Information on children and those under 18 years of age

We don't actively collect data on children, though we know some generously choose to fundraise for us. If we receive any information about children through our donation platforms, we'll make sure we have parental consent for anyone under 13. We don't market to anyone under 18. If we wish to keep a photo of someone under 18 for fundraising material, we'll get their consent if they are 13 or older, and parental or guardian consent if they are younger.

13. Profiling and fund-raising efficiency

To ensure our communications and fundraising efforts are as relevant and effective as possible, we may analyse certain information about our supporters.

- **Profiling for relevant communications:** We may analyse your personal information to understand your interests and preferences, so we can share updates and opportunities that may be of most interest to you.
- **Additional information sources:** Where available, we may use publicly accessible information (like geo-demographic and wealth indicators) to tailor our fundraising efforts effectively and understand the background of our supporters.
- **Segmentation for efficient fundraising:** Based on your giving history and that of other supporters, we may group supporters into “donor segments” (e.g., by donation amount, frequency, or other relevant factors) to develop our fundraising strategies. We may use software to support this analysis.
- **Third-party data:** To organise our fundraising efforts efficiently, we may include information from third-party sources, such as indicators of wealth, previous giving to other causes, and any public social media posts. This helps us direct our resources effectively, making appropriate requests to those more likely to contribute.
- **Data matching:** We may compare your information against external databases solely for fundraising purposes. The owners of these databases will not use your information themselves.

This analysis may be considered “profiling” under data protection law. You have the right to request that we stop this processing of your data. If you would like to opt-out or have any questions, please contact our charity office.

14. What are your data protection rights

You have several rights regarding your personal information, which may vary depending on the reasons we are processing your data. Your rights include:

- **Right of access:** You have the right to ask us for copies of your personal information (known as a [subject access request](#)). You can request copies of your personal health information by emailing westherts.accesstohealthrecords@nhs.net
- **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.
- **Right to erase:** You have the right to ask us to erase your personal information in certain circumstances.
- **Right to restrict processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Right to object to processing:** You have the right to object to the processing of your personal information in certain circumstances.
- **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.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to exercise any of these rights, please contact our data protection officer westherts.infogov@nhs.net

Alternatively, you can view the guidance around GDPR <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

15. How to contact us you have a complaint, a query or wish to compliment

If you are dissatisfied with our work or feel something has been overlooked, we want to hear from you. We also appreciate hearing what we're doing well. Your feedback helps us learn and improve our services. To share a complaint, compliment, or comment, please contact the Charity CEO westherts.raise@nhs.net

We understand that you might sometimes want an independent group to investigate your concerns. The Fundraising Regulator, which oversees charitable fundraising, can investigate cases where fundraising practices have caused public concern. Before reaching out to them, please allow us the chance to address your concern or complaint through our own process first.

The Fundraising Regulator
Eagle House
167 City Road
London, EC1V 1AW
0300 999 3407
www.fundraisingregulator.org.uk

We try to meet the highest standards when collecting and using personal information. We encourage people to bring concerns to our attention and we take any complaints we receive very seriously. You can submit a complaint by contacting our Information Governance team by emailing them on: westherts.infogov@nhs.net

If you remain dissatisfied with the Trust's decision following your complaint, you may wish to contact:

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

Their website is at www.ico.gov.uk

16. Monitoring & Compliance

1	Following local and national policies and guidelines, what key elements require monitoring?	List elements to be monitored	Data protection legislation
2	Who will lead/be accountable for monitoring?	Lead title	Information Governance and Data Protection Officer
3	Describe how the key elements will be monitored?	List tools to evidence compliance	Reviewed regularly to remain up to date
4	How frequently will each element be monitored?	List frequency of monitoring for each element	Annually
5	Explain the protocols for escalation in the event of problems?	List the processes of escalation	Charity CEO
6	Which Committee/ Panel/ Group will reports go to?	List the Committee/Panel/ Group/Peer Review that the reports will go to	Charity Committee
7	Explain how the policy/guideline will be disseminated within the Charity?	List ways identifying how this document will be shared and how it will be recorded that appropriate staff have been made aware of the document and where to find it	Notification of a new/revised policy shall be available to all via the Charity website. Available in On Board and G-Drive

17. References

Below are the third-party Privacy policies

<https://www.ebay.co.uk/help/policies/member-behaviour-policies/user-privacy-notice-privacy-policy?id=4260>

<https://www.justgiving.com/about/info/privacy-policy/privacy-policy-v40>

<https://www.muchloved.com/gateway/privacy-policy/>
<https://farewill.com/privacy>

<https://evalian.co.uk/privacy-notice/>