

Privacy Policy

WHO ARE WE

Basil's Forever Sofa (also referred to here as "we", "us", "our", and "the charity") is a UK registered limited company and charity with number 1211942. Any reference to 'the charity' includes (but it is not limited to) any of its trustees, volunteers, and suppliers to which the charity has appointed to provide services.

The objectives of the CIO are to: promote humane behaviour towards animals, by providing appropriate care, protection, treatment, and security for animals which need care and attention, by reason of sickness, and/or maltreatment. To educate the public in matters of dog welfare and in the prevention of cruelty and suffering, predominantly in Romania. Where appropriate, actively seek new homes for animals under the care of Basil's Forever Sofa.

To facilitate this, we gather personal information from you via an application for adoption. This data is then stored on a number of secure commercial platforms to which we either subscribe for management services or hold as an internal database. A list of service providers can be supplied if requested.

In order to comply with the General Data Protection Regulation (also referred to here as "GDPR" and "Data Protection Law") effective 25 May 2018, this Privacy Policy illustrates what personal data we collect, how we store and process your personal data, how long we hold your personal data for, your rights over your personal data we collect and process, and how to make an inquiry or complaint in relation to our use of your personal data.

WHAT DATA DO WE COLLECT

When you contact us, we may ask you for any or all of the following:

- Full name and title
- Date of birth
- Contact information including address and post code. This can also include place of work
- Job role and type of organisation you work at
- Photography, images and film
- Phone numbers and email addresses

- Communications preferences
- Family and friend connections, such as parents and siblings
- Whether or not there are children in your household
- Any details about the property you own or reside at that are relevant to rehoming a dog.
- Information that helps us recognise and respond to a person in vulnerable circumstances.
- Financial information such as bank account details (if setting up a standing order or direct debit) and credit/debit card information you have provided in order to make a payment
- Emergency next of kin details (if you are taking part in an event, volunteering for us or employed by us)
- Information about your activities on our website and about the device you use to access these, for instance your IP address and geographical location
- Details of how you have interacted with us, for example purchasing merchandise or enquiring about one of our fundraising events
- Information as to whether you're a taxpayer to enable us to claim Gift Aid
- Your affiliation with other charities
- If you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have).
- On the occasion of having to make a refunded payment we temporarily hold your bank or PayPal account details.

We do not collect any special categories of personal data, as defined in the GDPR. Our services are not aimed at children.

HOW DO WE COLLECT YOUR DATA

We collect your personal data when:

- you complete a contact form,
- when you contact us on social media,
- when you make a donation to the charity,
- when you send us an email enquiry

- when you complete a Gift Aid declaration
- when you call us by phone or other messaging service
- or when we make a refund to you
- When you become a registered volunteer for the charity
- Raise funds through participating at an event or challenge
- Access our website, purchase anything from the charity, search for information, sign up to one of our fundraising activities, complete an online survey, complete an online form, sign up for our e-newsletter, making a complaint online, asking us to contact you or just clicking on our website.
- Enquire about or pledge to remember us in your Will
- Engage with our services
- Engage with our social media, digital advertising or message boards
- Share your stories to encourage support of Basil's Forever Sofa
- Submit a job or volunteer application
- Enter into a contract with us as an individual or a third-party supplier
- Provide us with goods and/or services
- Whistle blow or make us aware of compliance and/or risk issues such as fraud, theft, bribery or money laundering
- Assist in an investigation involving fraud, theft, bribery or money laundering
- Test our technical systems to make sure they are working as expected.
- Exercise your data protection rights

We collect personal information that you give us indirectly from third parties – these include:

- When a relative of yours provides your name and contact details as an emergency contact
- Fundraising websites such as JustGiving (yYou should check the Privacy Statements of sites before you give them your information)
- Event organisers
- When we complete research and prospecting to bring more donors into our pipeline

- Registers which enable us to keep your data up to date (such as Royal Mails' National Change of Address Register, the National Deceased Register, and The Bereavement Register)

No automated decision making, as defined in the GDPR, is applied by us to your enquiry. Our skilled and trained volunteers, process your personal data and decide on the suitability of applicants for adoption and foster of our dogs using this data.

We may also collect information through publicly available sources:

We may also access information about you that is available in the public domain from sources including Companies House, the electoral roll, press reports and social media (such as LinkedIn, Facebook, Instagram, and X – formerly known as Twitter) depending upon your settings or the privacy policies of these services.

We also collect data through our website and digital channels:

When you interact with our digital platforms, we do not automatically capture or store your personal data but may automatically capture other information about your visit to help us better understand how supporters and beneficiaries use our digital platforms. This is to enable us to create better content and more relevant communications. The type of information we may capture includes:

- How you reached our digital platform and the internet protocol (IP) address you used
- Your browser type, versions and plug-ins, and your operating system
- Your journey through our digital platform, including the links you used, any searches you made, your length of visit overall and to each page, and other page interaction information
- Which videos you watched and for how long
- What content you liked or shared
- Which adverts you saw and responded to
- Which pop up or push messages you might have seen and responded to
- Demographic information such as geographical location and gender if available
- Information collected in any forms you complete
- The marketing activity that led to your taking specific action on our digital platforms (e.g., liking our Facebook page)

What we do with the information we collect

We require this information for the following reasons:

- To process donations and claim Gift Aid
- To respond to you if you have made an enquiry
- To thank you for your donations, volunteering, or other support
- To administer challenge and/or community events you undertake on our behalf
- To keep you informed about the work of Basil's Forever Sofa – such as our services, impact, fundraising, campaigns and events
- To invite you to participate in surveys or research
- To manage your communications preferences and consent
- To better understand your relationship with us
- For internal record keeping such as the management of feedback or complaints
- We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you
- We may make use of additional information about you, including geo-demographic information and measures of affluence, when it is available from external sources to help us understand the background of the people who support us. This helps us to make appropriate requests to supporters who may be able and willing to give more than they already do
- To administer our website and to troubleshoot, perform data analysis, research, generate statistics and personalise the online communications which are presented to you
- To allow for personalised communications and the targeting and retargeting of relevant adverts which ensure maximum cost effectiveness, by understanding how we can improve our services or information
- To disclose information relating to incidents involving dangerous dogs for insurance purposes under the Dangerous Dogs Act 1991
- To prevent fraud, misuse of services or money laundering and perform due diligence where required
- For financial management or auditing purposes required by a governing body to ensure compliance
- To safeguard our staff and volunteers;
- To publicise your story and experiences to raise awareness of our work. This will only happen after discussions with you, and with your consent. We keep you updated about when and where we use your story.

- To complete research and prospecting to bring more donors into our pipeline
- To respond to an enquiry or request for services and/or to administer our services – our legitimate interest balances with your interests.
- To maintain records of prospective, current and past adopters and foster carers of our dogs, our suppliers, our donors – our legitimate interest balances with your interests.
- To regularly communicate with current and past adopters and foster carers of our dogs – for the performance of a contract or agreement.

We reserve the right to disclose your personal information to third parties:

- We may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of Basil's Forever Sofa, its personnel, visitors, users or others.
- **Inappropriate online content**
If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws – such as defamatory content on our forums or social media pages – we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies.

You are advised to use social media platforms wisely and communicate / engage upon them with due care and caution regarding your own privacy and personal details.

HOW LONG DO WE HOLD YOUR DATA FOR

We will only retain personal data for as long as it is necessary to fulfil the purposes, we are using it for. How long we retain personal data will vary depending on the purposes it is used for:

- Your data pertaining to you and a successful adoption will be held indefinitely, or until we are advised that the dog has passed away, in order for us to provide lifelong Rescue Back Up as outlined in your adoption booklet.
- Data pertaining to failed adoptions will be held for up to 2 years to ensure the management process can be completed.
- Data collected to support Gift Aid declarations are kept for the tax year in which the declarations are made, to support repeat declarations.
- You can withdraw consent to us holding your personal data at any time and we will erase all your data within a month from receipt of a request from you to do so.

HOW DO WE KEEP YOUR DATA SAFE

We take the protection of your personal data very seriously and we take all possible measures to ensure that access is granted to as few people as possible throughout the adoption or donation process.

We only store your personal data where possible on encrypted databases. Where we do not store your personal data ourselves, we only use services and applications that have internationally recognised GDPR procedures in place. Where we use “Cloud” based service providers we endeavour to ensure that your data is stored within the EEA.

Our Website and Digital Advertising Cookies

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to improve the performance of a website, for saving different options and to provide website owners with information on how the site is being used.

We use cookies to enhance the experience of the websites, to increase the performance, to identify how the website is being used and where we can make improvements and to monitor how our advertisements perform. Some of our cookies are vital for the websites to operate effectively and others are optional but may decrease the usability or performance of the websites.

We may host encrypted personal cookie information on third party websites including Google and Facebook, to tailor and personalise our online communications with you. We use this information to identify ways in which you can support Basil’s Forever Sofa, and this allows us to show you more relevant digital content.

These third parties may include:

- Advertisers and advertising networks (for example, social media platforms like Facebook and Google Ad Sense)
- IT Service providers
- Analytics and search engine providers (for example, Google Analytics and Google Search).

These companies are used for the purpose of advertising the charity online and allowing us to effectively report the success of those adverts. For more information, visit <https://www.aboutcookies.org/>

WHAT RIGHTS DO YOU HAVE

As per GDPR, you have the following rights with regards to your personal data:

- **Access:** You have the right to request from us a copy the personal data we may hold about you and the purposes for which we are using it in a digital format. We may ask for proof of your identity prior to completing such a request. We will endeavour to respond to you as soon as possible, at most within one calendar month. Where we need additional time to complete your request we will inform you within one calendar month of receipt of the request.
- **Rectification:** You have the right to request that we amend any personal data which is incorrect or out of date.
- **Erasure:** You have the right to request that we delete any personal information pertaining to you. We will assess any deletion request and determine that either:
 - personal data is no longer necessary for the purpose which it was originally collected. Then we will erase it within 1 month of receiving your request,
 - personal data is still necessary for the purpose which it was originally collected, and we have the right to retain it. Then we will inform you of this.
 - you object to the processing of your data, and there is no overriding legitimate interest. Then we will erase it within 1 month of receiving your request.
 - we must erase it to comply with the Data Protection Law or any other law.

Case Studies

Photography, images, and film created for case studies are taken and used with your consent.

We will discuss with you how your, and/or your child's / relatives, image and information is going to be used and ensure you are happy for it to be used in this way. You can ask us to stop any time.

HOW CAN YOU ASK QUESTIONS AND MAKE COMPLAINTS

If you feel like you may want to ask us any questions about the personal data we hold for you, our processing and storing practices, or make a request for access, rectification or erasure you can contact us by email at basilsforeversofa@hotmail.com. We will endeavour to respond to your enquiry as soon as possible or within the timelines indicated elsewhere in this Privacy Policy.

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can do so by email to basilsforeversofa@hotmail.com.

You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office, the UK data protection regulator.

WHO DO WE SHARE YOUR PERSONAL DATA WITH

We will not share your personal data with any third parties (unless there has been a serious breach in animal welfare) other than those providing a direct service to us, and then only for the purpose of providing that service.

We may need to disclose your details to regulators, government departments, law enforcement authorities including the Police, legal advisors, tax authorities, insurance companies, and any relevant dispute resolution body or the courts.

We may share your personal details with Pettrac or Animal Tracker (microchip databases) in order to register you as the owner of a dog you have adopted or taken in foster from us.

Unfortunately, no data transmission over the internet is 100 per cent secure. As a result, while we try to protect your personal information, Basil's Forever Sofa cannot guarantee the security of any information you transmit to us and you do so at your own risk.

HOW DO WE COMMUNICATE UPDATES TO THIS PRIVACY POLICY TO YOU

We may review and update this Privacy Policy from time to time to reflect changes in our personal data processing practices and to comply with regulatory changes. We encourage you to review this Privacy Policy when providing any personal data to the charity, so that you can be informed as to the approach we take to protecting your data.

Version 1

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