

# PRIVACY POLICY

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## 1 ABOUT THIS PRIVACY POLICY

- 1.1 This policy sets out, as a business, how we process data both inside the business, and on the website.
- 1.2 The website <https://summitfundraising.co.uk/> (the Website) is operated by Summit Fundraising (we, us, our), a Business incorporated in England and Wales under company number 10545955. Our registered office is 293 Kenton Lane, Harrow HA3 8RR.
- 1.3 We are committed to protecting your privacy and complying with our data protection obligations under the Data Protection Act 2018 (the DPA 2018), the UK General Data Protection Regulation 2016/679 (the UK GDPR) and any other applicable UK legislation (together, Data Protection Law).
- 1.4 When you interact with us or use the website, we act as the data controller of your personal data. This means we are responsible for processing your personal data and deciding how to use it. This privacy policy explains the types of personal data we may collect about you when you interact with us, why we collect it, what we use it for and what rights you have over it. Personal data is any information about an identifiable person. Processing is anything we do with your personal data, including using, storing, sharing and deleting it.
- 1.5 This policy was last updated on the date shown at the top. We may change this policy at any time by posting an updated version on the website and will make reasonable efforts to bring any material changes to your attention. You may wish to check it before using the website, as any changes will be effective from the date they are made.

## 2 CONTACT INFORMATION

- 2.1 If you have any concerns or want further information about our use of data or this policy in general, you can contact Louise Morris at the address above or by email, [louise@summitfundraising.co.uk](mailto:louise@summitfundraising.co.uk).

## 3 WHAT INFORMATION DO WE COLLECT?

- 3.1 We collect, store and use the types of personal data set out in the tables at the end of this policy.

## 4 HOW WILL WE USE YOUR PERSONAL DATA?

- 4.1 We will use your personal data for the purposes set out in the table at the end of this policy.

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## 5 HOW DO WE SHARE YOUR PERSONAL DATA?

- 5.1 When we share personal data, we do so under Data Protection Law. We may share specific personal data, where necessary, with employees, contractors, consultants or advisers to facilitate sales and for general commercial purposes.
- 5.2 We may also provide third parties with aggregated but anonymised information and analytics about our customers. Before doing so, we will ensure that it does not identify you.

## 6 SHARING INFORMATION

- 6.1 We endeavour to keep as much data within the UK/EU. However, there may be times when this is not possible. Where the platforms we use are outside of the UK, or not a country where we have adequacy regulations, we will assess if the transfer is necessary to perform our service under the contract and that the data transfer comes under a restricted transfer.
- 6.2 Where we are legally required to do so, information is shared. On occasion, we may not be allowed to tell you of information being shared.
- 6.3 A complete list of the information we collect can be found [here](#).
- 6.4 The website may contain links to other websites over which we have no control, such as Zoom or Calendly. We are not responsible for and do not review or endorse the privacy policies or practices of other websites you choose to access from this website. We encourage you to review the privacy policies of those other websites to understand how they collect, use and share your personal information.
- 6.5 The website does have plug-ins that we use for third-party platforms described in the table below.

Type of plugin	Name and link of Business
Contact form	Goes from the website to email
Videos	YouTube – Pop-up is enabled
Online booking form	Zoom – Pop-up is enabled
Stripe	

## 7 YOUR RIGHTS

- 7.1 We respect your privacy rights and will respond to requests for access or control over information about you under Data Protection Law. We may require you to verify your identity before we take any action.
- 7.2 Depending on the reason we have your personal data, you have a right to:
- a) access the personal information we hold about you (commonly known as subject access);
  - b) request that we correct or complete personal information we hold about you that is inaccurate or incomplete;
  - c) request that we erase your personal information in some circumstances or object to our processing it;
  - d) restrict how we use your personal data in certain circumstances;
  - e) request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services; and
  - f) where we have asked for your consent to process your data to withdraw this consent.
- 7.3 These rights are limited in some situations under Data Protection Law – for example, where we can demonstrate that we are under a legal obligation to process your data.
- 7.4 If you wish to exercise any of these rights, please contact us.

### **Your right to object**

- 7.5 You have a right to object to our processing of your personal data and ask us to stop doing so. Suppose we are processing your personal data for direct marketing purposes (which includes profiling to the extent that it is related to such direct marketing) and you object to this. In that case, we will stop processing your personal data immediately.
- 7.6 Suppose our processing of your personal data is in the public interest or under our legitimate interests and you object to this. In that case, we will stop processing your personal data unless we have compelling reasons which override your interests or our use of your personal data is for the establishment, exercise or defence of legal claims.
- 7.7 We hope to satisfy any queries you may have about how we process your data. However, if you have unresolved concerns, you can make a complaint to Summit Fundraising in the first instance. You also have the right to complain to data protection authorities (in the UK, the Information Commissioner’s Office) if you feel your complaint hasn’t been resolved. You can call the ICO on 0303 123 1113 or visit their website: <https://ico.org.uk/make-a-complaint/>).

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## 8 DATA RETENTION

- 8.1 Your personal data will only be kept for as long as necessary for our purposes. Specific retention periods are set out in the table at the end of this policy.
- 8.2 At the end of the specified retention periods, your personal data will either be securely destroyed or anonymised unless we must keep it to comply with our legal obligations.

## 9 DATA PROTECTION PRINCIPLES

- 9.1 We process your personal data under the following principles:
- a) We process your personal data lawfully, fairly and in a transparent way;
  - b) we collect your personal data for specified, explicit and legitimate purposes; any further processing we do is compatible with the original purposes for which we collected it;
  - c) we only process personal data that is adequate, relevant and limited to what is necessary to achieve the purpose for which it is processed;
  - d) we take reasonable steps to ensure that all personal data is accurate and kept up to date where necessary;  
we do not store personal data in a form that identifies you for any longer than is required for our processing; and
  - e) we process personal data securely and in a way that protects against unauthorised or unlawful processing, accidental loss, destruction or damage.
- 9.2 When we ask for your personal data, we will tell you whether you are required by law or contract to provide it and what will happen if you do not provide it.
- 9.3 Any request for consent to processing your personal data will be made directly to you and will include information about why we require the personal data and what will be done with it.

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## 10 WHAT IS OUR LAWFUL BASIS FOR PROCESSING?

- 10.1 We will only process personal data when we have a lawful basis for processing. The table at the end of this policy sets out the legal basis we rely on for each type of data we process.
- 10.2 We will choose one of the lawful bases in the UK GDPR to justify how we use your personal data. These are:
- a) Consent: You have given consent to the processing of your personal data for one or more specific purposes. As detailed above, you have the right to withdraw your consent at any time.
  - b) Contract: The processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
  - c) Legal obligation: We must process your personal data to comply with a legal obligation.
  - d) Vital interests: The processing is necessary to protect the vital interests of you or another person.
  - e) Public interest: Processing is necessary for performing a task in the public interest or in the exercise of some official authority.
  - f) Legitimate interests: Processing is necessary for legitimate interests pursued by us or someone else, except where such interests are overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

## 11 Contractors

- 11.1 The Business will only process personal data when there is a lawful basis for doing so. In general, the foundation will be that:
- a) processing is necessary to perform the contract and/or
  - b) processing is required for the Business to comply with its legal obligations; and/or
  - c) processing is required for the purposes of the Business's legitimate interests (unless those interests are overridden by the fundamental rights and freedoms of the individual).
- 11.2 Where none of these lawful bases applies, the Business may ask for consent to the processing of their personal data as described below.
- 11.3 The table below sets out the categories of personal data processed by the Business, the purposes of that processing, the basis for processing and the retention period for the data. Some of the Business's processing will involve special categories of personal data. The Business will only process this data where there is a specific lawful justification and only to the extent necessary to fulfil its lawful purpose.

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## 12 TABLE OF PERSONAL INFORMATION WE USE

The table below sets out detailed information about the types of personal information we collect, our purposes for processing, the basis for processing and the retention period for the personal data.

### Clients

When collected / stored	Category of personal data	Purpose of processing	Lawful basis for processing	Retention period
Contract Website Email marketing platform	Name and contact details	For fraud prevention and detection To contact you with information, newsletters and marketing materials about our products and services	Performance of contract Compliance with legal obligation Consent	For 12 months from. Last interaction, or until you withdraw consent if earlier
Bank transfer	Payment information	For fraud prevention and detection	Performance of contract Compliance with legal obligation	For three years since end of contract date
Emails CRM Project management platform	Contact history	To provide customer service and support	Performance of contract or request e.g. attendance at free event Legitimate interests in dealing with complaints or claims	For six years since last contact
Website Testimonials	Customer comments	To improve our products and services Where relevant, to establish, exercise or defend legal claims	Performance of contract	For six years

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When collected / stored	Category of personal data	Purpose of processing	Lawful basis for processing	Retention period
Emails			Legitimate interest in dealing with complaints or claims and improving our products and/or services generally	
Website Social media platform analytics	Information collected through cookies and similar technologies	<b>Cookies are set not to be collected on this site.</b>	Consent pop-up on YouTube videos	For three years since you gave consent, or until you withdraw consent if earlier

**Contractors**

Category of personal data		Purpose of processing	Lawful basis for processing	Retention period
Contact details including name, phone number, email address and home address		To communicate, to keep accurate records with the Business and to fulfil the Business's duties to supply accurate information to bodies such as HMRC	The processing is necessary to perform a contract. The processing is necessary to comply with a legal obligation.	Throughout the contract and for up to six years after comes to an end

Signed:



Director, Summit Fundraising Ltd

1<sup>st</sup> February 2023

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