

VETERANS ASSOCIATION – PRIVACY POLICY

Adopted:

Review date:

Aims and objectives

The Veterans Association takes your privacy very seriously, and we want to assure you that your personal information is safe. Our privacy policy covers how we treat your data and put you in control of what happens to it.

Our Mission is to provide support and rehabilitation for men, women, and their families whose lives are affected by their service in the armed forces.

We will never sell your data to third party organisations. We will collect and use your personal information only if we have your permission, or we have justified reasons for doing so.

We will be clear at the point when we collect your information about how we will use it, and who we might share it with. We will use your personal information within the appropriate lawful basis for which it was collected, and we will make sure we delete it securely once we no longer need it.

General information

We will contact you with your permission via methods of communication you have consented to, or where we have a legitimate interest to do so. As a supporter, member or volunteer of the Veterans Association, you can contact us any time you wish, to change the way we contact you, including opting in to, or out of, future communications.

We do all we can to make sure fundraisers, volunteers and third party agencies working with us comply with this privacy policy. We will always provide easy ways for you to contact us, and we are on hand to help answer any queries you may have about your data.

If you are unhappy with anything we've done in relation to your data, please contact us and we will look in to what's happened straight away. We have protocols in place to ensure your data protection, but in the event of a mistake, we will follow strict procedures to keep you informed and put things right.

The Veterans Association is a UK registered charity under registration number 1199584.

Privacy policy

This policy describes how the Veterans Association collects and uses personal information about people who visit our websites and give us their information over the phone, face to face, and in writing. The terms of this policy may change to reflect our practices in what we do with your information. If we make significant changes to our Privacy Policy, we will highlight that there has been a change on our website and on communications for a discretionary period of time.

If you have any queries about this policy please contact us on 0800 310 1044 or by email to support@theveteransassociation.org

How we collect personal data

The Veterans Association is the data controller of the personal information you provide to us, and we will determine and tell you about the purpose for which we are collecting your information and how we will use it. We collect your personal information in a number of ways:

- When you provide it to us directly via telephone, letter, email, text / messaging service or the Veterans Association forms or via an organisation working for us (eg a fundraising agency)
- When you give other organisations consent to share it with us
- When we collect it as you use our website or social media pages
- When you have consented to third parties sharing it with us; for example from our service providers or from a friend who wants to tell you about our websites or the assistance we may be able to provide or the fundraising activities we carry out

We will collect your personal information when you enquire about our activities, register with us, send an email, make a donation to us, ask a question about our services or otherwise provide us with personal information.

Third parties who collect your data

When browsing third party platforms including social media, where the Veterans Association maintains a presence, we will be joint-controllers of your data with the third party platform's owner. The third party platform will process your data in line with their privacy and cookie policies. In such circumstances, you will be able to update your cookie preferences directly on the third party platform. You will not be able to update your preferences through the Veterans Association.

Currently, the Veterans Association maintains a presence on and therefore is a joint-data controller with the following third party platforms:

- Facebook: [Read their Data Policy](#)
- Instagram: [Read their Data Policy](#)
- Twitter: [Read their Privacy Policy](#)
- LinkedIn: [Read their Privacy Policy](#)

Publicly available information

We may combine information you have given to us with information available from external public sources in order to gain a better understanding of our visitors and supporters to improve our fundraising and marketing methods. This will only be done when you give permission to the relevant third-party organisations to share with us the data they hold on you, or if the data is already publicly available, or if we are required by law or requested by the police or a regulatory or government authority investigating potentially illegal activities. To ensure fundraising is appropriate, we may add publicly available information to your records to create a profile of your interests and level of potential donations to us.

This type of profiling allows us to target our resources effectively, to 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. We will tell you about current and future fundraising campaigns that we think are relevant to you, and how you can make a difference to our reach and impact through a donation or other involvement. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would. If you would prefer us not to use your data in this way, you can ask us not to.

What personal data do we collect?

The personal data we collect might include name, date of birth, email address, postal address, telephone number and bank, credit or debit card details if you are supporting us financially.

We may also collect special category data (previously referred to as 'sensitive personal information') such as information about your health if this is required for the purpose you have contacted the Veterans Association. We will be very clear about the reasons we need this information and would only do so with your specific consent.

We also gather general information about the use of our websites, such as which pages users visit most often, and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in the Veterans Association emails. We may use this information to personalise the way our websites are presented when users visit them, to make improvements to our websites and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our websites. In addition, we may use the information to build profiles of people who would be interested in our services. Please see our Cookie Policy.

How we use this information?

We will use your personal information for one or more of the following purposes:

- Dealing with your enquiries and requests
- Providing information about products and services
- Fundraising
- Contacting you to promote our services. If we do not have your contact details such as your telephone number, e-mail address, or postal address, we may source this information via third party companies
- Providing and personalising our services
- Conducting market research
- Conducting research into issues affecting the Armed Forces community
- Profiling and segmentation so that we can offer supporters / members / volunteers products relevant to them
- For administrative purposes

The Veterans Association may analyse the personal data we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way, and with the most relevant information, to provide a better experience for you.

We may need to share your information with our contracted service providers and agents for the purposes described above.

Only the Veterans Association will receive your personal information, and it will only be used for the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide. The Veterans Association will not pass on your details to anyone else (unless they are acting on our behalf or a supplier under agreement with the Veterans Association) without your consent; except in exceptional circumstances such as to comply with the law. Examples of this might include people contacting the service reporting abuse, anyone reporting serious self-harm, anyone expressing the intention of harming someone else, or any matter regarding national security.

Your personal information and details of the enquiries received are stored on a secure database. If for any reason you wish to have your personal details amended or removed, please contact us.

Your right to opt out

You have a choice about whether you want to receive information about our progress, fundraising activities, membership or campaigns. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your marketing preferences (such as email, phone, text or post at any time), by contacting us using the details below.

- **Post:** 2 Surrey Gardens, Birchington, Kent CT7 9SA
- **Telephone:** 0800 3 101044
- **Email:** support@theveteransassociation.org

The lawful basis we use to process your data

We will process your personal data under one or more of the following lawful bases:

- You have given us clear consent
- You have entered into a contract with us
- We have a legal obligation to process the data
- The processing is necessary for your vital interests i.e. to protect your life
- We have a genuine and legitimate reason and we are not harming any of your rights and interests

Consent

Where we ask for your consent to process your personal information, we will use clear plain language so you can fully understand what you are consenting to. We will tell you what we will be doing with the information, and explain your right to withdraw consent and how you can do that. We will only use your personal information you have provided for the purpose we have gained your consent for. We may also ask you to confirm that you still consent where a considerable period of time has lapsed since you last had any contact with the Veterans Association.

Legitimate interests

We may process your personal data where we have a genuine and legitimate reason to do so, and we are not harming any of your rights and interests. Our legitimate interests will be in providing lifelong support for the armed forces community, fundraising, organising events and campaigning.

This means that we may use your personal data for direct marketing, fraud prevention, network and information security, crime prevention/detection and analytics so that we can improve our services to give you the most appropriate information and ensure our fundraising campaigns are effective.

Our legitimate interests are as follows:

- **Direct Marketing:** We will send postal marketing and fundraising asks which further the aims and objectives of the Veterans Association. We will also make sure our postal marketing is relevant for you, tailored to your interests.
- **Personalisation:** Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our supporters.

- **Analytics:** To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.
- **Research:** To determine the effectiveness of promotional campaigns and advertising, and to develop our products, services, systems and relationships with you.
- **Due Diligence:** We may need to conduct investigations on supporters, potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

We will process your personal data for our legitimate interests in a way we consider you would reasonably expect, to be proportionate and with minimal impact on your privacy. We will carry out assessments to ensure that we consider whether the processing is necessary and by balancing it out with your rights and freedoms.

You have a right to object to your personal data being processed under legitimate interests if you do not consider we have compelling legitimate grounds for the processing. Please see the section below for more information.

Your rights

Under the General Data Protection Regulations (GDPR) you have the following rights:

- Transparency over how we use your personal information (right to be informed)
- Request a copy of the information we hold about you, which will be provided to you within one month (right of access)
- Update or amend the information we hold about you if it is wrong (right of rectification)
- Ask us to stop using your information (right to restrict processing)
- Ask us to remove your personal information from our records (right to be 'forgotten')
- Object to the processing of your information for marketing purposes (right to object)
- Obtain and reuse your personal data for your own purposes (right to data portability)
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling)

If you would like to know more about your rights under the GDPR see the Information Commissioners Office website.

If you would like to make a request for any of the above actions, please submit your request to us by post at 2 Surrey gardens, Birchington, Kent CT7 9SA or via email to support@theveteransassociation.org.

How long will we keep your personal data?

We will ensure that your personal data is kept only for so long as is necessary for the purpose for which it was collected, and is securely destroyed in accordance with our retention schedule. Where possible we will inform you of how long we will retain the personal data you are providing to us.

Where you no longer wish for the Veterans Association to contact you we may have to keep some basic data about you to ensure that we do not contact you in future.

Will we disclose the information we collect to outside parties?

We do not share or sell supporter or member details with other charities or other third parties.

We will only disclose data when obliged to disclose personal data by law, or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation, or we have your consent.

Changes to your details

If your personal details change, please help us to keep your information up to date by notifying us.

We may change the terms of this privacy policy from time to time. By continuing to use our websites you will be deemed to have accepted such changes.

Data Protection Regulator

Further information and advice about data protection law and compliance is available from the Information Commissioners Office.

- **Website: www.ico.org.uk**

Changes to our Privacy Policy

Should we need to change our privacy policy we will share the changes here. Where the changes are significant, we may also choose to email all our registered supporters and members with the new details. Where required by law, will we obtain your consent to make these changes.