

Privacy Notice

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1. Who we are

The Hugs Foundation is a rescue and rehabilitation charity for horses, ponies and donkeys that have been mistreated, abandoned or unwanted. We also provide well-being support to children, young people, the elderly, military personnel and veterans to improve their health and well-being.

The Hugs Foundation has its head office at Higher Whitely Farm, Helland Road, Bodmin, Cornwall, PL31 2NT (charity no. 1175633). The Hugs Foundation is registered as a data controller on the UK Data Protection Register (registration number **ZA491010**)

2. How we look after your data

The Hugs Foundation is committed to respecting your privacy. This privacy notice explains how and why we use your personal information. It applies to all personal data gathered when you engage with The Hugs Foundation as a supporter, volunteer, service user or as an enquirer. If you have any questions about what's detailed here or want to know more about how we're making privacy a priority, please get in touch by emailing dpo@hugsfoundation.org.uk – we want to make sure you are comfortable with how we manage your personal information.

3. Why we collect your data

As a charity, it is important for The Hugs Foundation to be able to collect your data to process your enquiries, donations, and any other interactions you may have with us. We need information to ensure we offer the highest level of support to people and the animals we look after and to provide the best possible service. We rely on continued donor interest, monetary contributions and your goodwill.

The main purposes for gathering your personal information are for equine services, well-being services, volunteering, marketing activities, and for fundraising and transaction processing.

4. Types of personal data we collect

Here is a list of the types of information we collect from you, depending on your interaction with us:

- Your first name or initial, and surname.
- Your email address.
- Your telephone number.
- Your place of work or employment.
- Your business or company bank account or other payment details.
- Your postal address.
- Your year of birth for validation purposes.
- Your transaction ID.
- Your Gift Aid declaration.
- A record of our communications with you.
- Your communication preferences.
- Your giving history.
- Your browsing history (see section: Information from your devices (automatically)).
- Your interests, and reasons for your support.
- Your enquiry our services.
- Information collected as part of our equine services, such as details relating to your personal circumstances.
- Information about your animal, such as their behaviour, medical conditions and treatments as part of the gifting process.
- Your next of kin details, such as when you are participating in an event.
- Photography, transcripts and videography, such as images at events, case studies and other marketing materials.

We may also, in some cases, process special category (sensitive) data about you. The special category data we collect may include:

- Disability information
- Information about health conditions

5. Where does this information come from?

The Hugs Foundation typically collects personal data about customers through the sales and marketing process, either directly from customers or sometimes from your employer. We may sometimes collect additional information from third parties including online business directories.

If your employer is sharing your details with us, you have a right to know and to be aware of what personal information we hold about you, how we collect it, how we use it and how we may share that information. We ask employers to share this policy with you.

This data can be collected:

- Online – information you provide when making an enquiry or donation and information we collect from your devices using cookies.
- Post or phone – when donating or enquiring about our services.
- Via third parties – information you provide face-to-face through professional fundraisers.

How your information is collected online
We collect personal information from you when you visit our website, interact with us via a social media platform using a smartphone or computer (for example, by storing your account information), and when you directly contact us. For more information, see the Cookies Section.

Information you provide
When you use our website to make an enquiry, volunteer, register for an event, access services, or donating, you'll need to give us some details, so we can do what you've asked us to do.

Similarly, if you make an enquiry, want to register as a volunteer, or make a donation by telephone or post, you'll need to share some basic information about yourself.

Usually this will include:

- Your first name or initial, and surname.
- Your email address.
- Your telephone number.
- Your postal address.
- Your payment details if you're donating.

We don't store any of your payment details either online or through cheques. Instead, we're given a transaction ID by our payment processor to complete the transfer, or the cheque is banked without your bank details being stored.

Information from your devices (automatically)
When you browse our website or our social media platforms, your device will exchange information with these platforms to ensure you have the best experience when navigating.

Our platforms may pick up the following:

- IP (Internet Protocol) address: your IP address indicates your location, unless you are using a VPN (Virtual Private Network) service.
- MAC (Media Access Control) address: this is a unique identifier assigned by the manufacturer of your device.
- Device: what type of device you are using (smart TV, smartphone, laptop, desktop).
- OS (operating system): what operating system your device has (IOS, Android, Windows, Linux, MAC OS X).
- Browser type and browser version: which web browser you are using (Internet Explorer/Edge, Opera, Chrome, Safari, Firefox).
- Domain: depending on your device and browser settings, we sometimes identify the web address of the domain you came from before landing on our platforms.
- Clickstream data: this is a list of all of our web pages that you visited, and the order you viewed them in, on each visit to https://hugsfoundation.org.uk. We also record how much time you spend on each web page and record any actions you make on each page.
- Cookies: these are small text files that our website places on your device, so that our website can remember something about you and optimise the website for your visit. There are also some third-party cookies we place on your device. For more information on the specific cookies that we use and their function, please see our Cookie Policy.

How your Information is collected by post and by phone
If you call or write to us, we may collect the following information about you:

- Your first name or initial, and surname.

- Your email address.
- Your telephone number.
- Your postal address.
- Your transaction ID.

How your information is collected by third parties
Sometimes we will obtain your personal information from third-party data suppliers, but only if they provide the appropriate evidence that you have agreed for your personal information to be shared with us.
Usually this will include:

- Your first name or initial, and surname.
- Your email address.
- Your telephone number.
- Your postal address.
- Your transaction ID.

You should check any Privacy Policy provided to you where you give your data to a third party.

6. How do we use your personal information?

In simple terms, your personal data may be used to help us effectively deliver our charitable services or raise funds for those charitable services, and/or deliver the best service for an animal.

The Hugs Foundation will never sell your data to third party companies or organisations. The only instance where we will share your data is with carefully selected and screened subcontractors for marketing, fundraising, and business insight purposes. Please see the Disclosing your information section for more information.

How we use your data for these purposes will depend on the nature of our relationship with you. Below are some examples.

- To negotiate with you to enter a contract as a customer with us
- To communicate with you as one of our customers
- To fulfil our obligations to you as one of our customers in relation to your contract with us
- To provide you with a safe environment of which to access our services and to make any reasonable adjustments when you visit our site
- To better understand your needs and tailor our services to give you more benefit from them

Volunteering

- To enable us to recruit volunteers.
- To support and train volunteers and ensure their safety.
- To enable us to communicate with volunteers regarding their volunteering work, the wider work of The Hugs Foundation and how they might support in other ways.

Marketing and fundraising

- To send you marketing information, general information about rehoming, volunteering and various ways you can support The Hugs Foundation, including fundraising events such as road shows or community events.
- To efficiently raise fundraising income.
- To manage, facilitate and record financial transactions associated with fundraising.
- To manage events and fundraising activities.
- To ensure that as many supporters as possible maximise the value of their donation through Gift Aid.

Legacies

- If you have got in touch with us about leaving us a legacy, we will manage and administer your legacy pledge.

Events

- To process registration fees (sometimes through third-party websites) and administer events.
- To collect and store images and videography with the purpose to promote future fundraising events.

Surveys
We will survey portions of our supporter database periodically to find out more about your experience of dealing with The Hugs Foundation, how you use our services, and how we can improve our service delivery to you. We will not confuse this with marketing or promotional messages.

Segmentation and profiling

We use segmentation techniques to better understand our supporters and allow us to send you messages and marketing tailored to you. We also use it to find more people like you who share our vision of pets being well cared for in loving homes for life.

An important component in finding new Hugs Foundation supporters is profiling your personal data. We aggregate elements of your personal data such as age band, location, email and gender and match this data against other sources to find similar profile individuals. We will sometimes bring in additional demographic data to enhance the information we have on you from third-party organisations. This information could be household composition, number of cars or socio-economic grouping, for example.

7. Filming and photography at events

Please note that The Hugs Foundation (or our authorised service providers) or our commercial partners may film or photograph participants, volunteers and spectators attending or taking part in events.

We will use this footage, or photographs, to publicise the event for our general charitable, commercial and/or fundraising purposes including, but not limited to: television broadcasts, advertising, publications, marketing material, marketing our products, merchandising, social media, personalised direct mail and other media that may be made available to the public. We may also use it to enable our commercial partners to publicise their involvement and/or association with the event.

No personal details (including names) of any under 16-year-old participants will be used in any publicity materials without the written consent of their parent or legal guardian, but we may use images where children are incidentally included (for example, images of mass participation in the warm-up exercises, or on the starting line).

8. How the law applies to the Hugs Foundation

From 25 May 2018, the General Data Protection Regulation (GDPR) applied to our collection and use of your personal data. Now that Britain has left the EU, data protection law has been converted into UK domestic law. This means that the GDPR has been retained in UK law and will continue to be read alongside the Data Protection Act 2018, with technical amendments to ensure it can function in UK law. Under UK GDPR The Hugs Foundation is required to have a legal basis for processing for both collecting and using your personal data. We use the following legal bases for processing: Consent, Legitimate Interest, Contract, and Legal Obligation.

The Hugs Foundation will only process your personal information if any of the following apply:

Consent

In some cases, we will rely on consent, for example, to send you or make marketing and fundraising emails, phone calls and text messages; or to use your image or a case study about you.

Legitimate interest

Under GDPR, The Hugs Foundation will use this legal basis for processing, if we feel that the use of personal data is legitimately in the interests of the charity, provided there is no disproportionate impact of our activities on you.

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Contract

In some cases, we will contact you under the legal bases for processing under Contract. For example, when we negotiate with you to enter a contract as a customer with us, or communicate with you as one of our customers

Legal obligation

Sometimes we may have a legal obligation to process information about you – for example, we are obliged to keep financial records including Gift Aid for six years. We are also required to keep a record of your communication preferences, in accordance with the General Data Protection Regulation.

9. How long we keep your personal data?

If you made a donation to The Hugs Foundation: we will keep the information you gave us and details of your donation, for up to seven years from the date of the last transaction with us.

If you expressed interest in or leave a legacy to The Hugs Foundation: we will keep the information you gave us and details of your planned gift until notified of the gift, or until you change your instruction.

If you enquired about or used The Hugs Foundation's services: we will keep the information we have on you as an enquirer/user of this service for up to xxxx years, which reflects how long your animal(s) might live. After that time, your personal data will be anonymised, and we will keep your enquiry/service use details and communications history.

If you wrote to us: we will keep any correspondence with you for six years, although we may keep this information longer if your correspondence is a complaint.

In these cases, we'll only retain data that is necessary for these purposes, and we will delete or anonymise other parts of the record. In some cases, there will be a need to keep your data longer:

- For the purpose of recognising a Legacy Gift, as this could take decades until the gift reaches us. Further to this if the legacy gift is contested, we need to evidence the history between the legator and The Hugs Foundation.
- For the purpose of analysis to ensure that we can spot trends and adjust our business objectives to deliver a better service.

If you decide you no longer wish to hear from us, we'll need to keep a note of that on our suppression list indefinitely.

If you'd like more information on our retention policy, please contact us.

10. Disclosure of your Personal Data

The Hugs Foundation uses carefully selected and screened subcontractors to assist in the management and structure of business information for transaction processing, marketing and business insight purposes. The information the subcontractors process includes the personal information we gather about you and your service use, transaction and online history with us.

The Hugs Foundation will ensure that your personal information is not disclosed to third parties, unless otherwise permitted under the statements below:

- You have given consent.
- Under legitimate interest, where we feel that the use of personal data is legitimately in the interests of The Hugs Foundation, provided there is no disproportionate impact of our activities on you.
- Where disclosure is required to allow a requested service to be provided.
- Where The Hugs Foundation is legally obliged to disclose the data (e.g. in relation to a Charity Commission inspection or inquiry, police investigations, under a court order etc), or
- Where disclosure of data is required for the performance of a contract.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions. Some of our partners run their operations outside of the EEA (European Economic Area) and this may include countries who have different data protection laws. We will always take steps to make sure appropriate protections are in place (in accordance with UK data protection law) and that information is safeguarded.

11. Use of Cliniko – Counselling and Well-Being Services

The Hugs Foundation uses Cliniko, an online practice management system, to support the safe and effective administration and delivery of its counselling, therapeutic and well-being services for adults. We may use Cliniko to record and manage personal information such as contact details, referral information, appointment bookings, consent records and relevant session notes.

Where necessary for the delivery of our services, we may also process special category personal data, including information about your physical or mental health, emotional well-being and personal circumstances. This information is handled confidentially and accessed only by authorised individuals who require it for their role.

Cliniko is a third-party service provider that processes personal data on our behalf. We take appropriate steps to ensure that personal information is handled securely and that suitable contractual and data protection arrangements are in place. Information will not be shared with Cliniko for unrelated purposes by The Hugs Foundation. We will only share personal information with other professionals or organisations where there is an appropriate lawful basis, such as with your agreement where appropriate, where necessary to safeguard an individual, or where we are legally required to do so.

We retain personal information only for as long as necessary in accordance with our retention arrangements and legal obligations. You have rights in relation to your personal data under UK GDPR, including rights to access and, in certain circumstances, correct or erase information. Further information about how we process personal data, our lawful bases for processing, data retention and your rights is available in this Privacy Notice or from The Hugs Foundation directly.

12. Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

- Your rights regarding your personal data are: The right to access a copy of your personal information that we hold.
- The right to object to our processing of your personal data, if our doing so causes you distress.
- The right to prevent The Hugs Foundation processing your data for direct marketing purposes.
- The right to object to decisions being taken using automated means that includes your personal data.
- Your right to have inaccurate personal data rectified or destroyed.
- Your right to have your data erased from our IT infrastructure
- The right to data portability.
- The right to be informed.

The Information Commissioner remains the UK's independent advisory authority on data protection. You can find out more about your personal data rights in the UK from the Office of the Information Commissioner, www.ico.org.uk

13. What to do if you are not happy

In the first instance, please talk to us directly so we can help resolve any problem or query. You can reach us on dpo@hugsfoundation.org.uk

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at public.fundraisingpreference.org.uk or by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their helpline 0303 123 1113 or at www.ico.org.uk

14. Who to contact about your information

You can always request a copy of all your personal information that we store, free of charge, any time by writing to:
The Data Protection Officer at The Hugs Foundation, Higher Whitely Farm, Helland Road, Bodmin, Cornwall, PL31 2NT.
Or email: dpo@hugsfoundation.org.uk

15. Notification of changes to this Privacy Notice

This Privacy Notice may change from time to time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up to date with the changes to our Privacy Notice.