



**Royal  
Osteoporosis  
Society**

Better bone health for everybody

## **Privacy Policy**

Executive Director: Helen Kingman, Corporate Services

Authors: Juliette Morgan, Head of Corporate Governance, Jo Sumnall, Head of Supporter Engagement, and Sarah Whybrew, Corporate Governance Manager.

Audience: For supporters and the general public

Issued: December 2018

To be reviewed: December 2019

Updated to Royal Osteoporosis Society on 5 February 2019

## Contents

1. Introduction and Purpose .....	3
2. What we do not do .....	3
3. How we use your information .....	3
4. Data received or shared with third-parties.....	10
5. How we store your personal data and keep it safe.....	10
6. Your Rights .....	11
7. Changes to our Privacy Policy .....	11
8. Contact us .....	11

# Privacy Policy

## 1. Introduction and Purpose

At the Royal Osteoporosis Society we are committed to protecting and respecting your privacy and keeping your data safe. This privacy policy (together with our terms of use and any other documents referred to in it) sets out how the charity collects and uses your data, and your rights to have your personal data protected.

Gaining a better understanding of our supporters and beneficiaries through collecting, storing and processing personal data allows us to make more informed decisions about the support and services we provide and the fundraising we conduct. It helps us to make more efficient use of our resources and ultimately, to bring us closer to ending osteoporosis for good.

See our Supporter Charter which outlines our commitment to ethical fundraising practice. We are also registered with the Fundraising Regulator, commit to the Fundraising Promise and comply with requirements of the Fundraising Preference Service.

The data controller is the Royal Osteoporosis Society, a charity registered under number 1102712 in England and Wales and in Scotland under number SC039755; a company limited by guarantee registered under number 04995013 in England and Wales with registered offices at Camerton, Bath, BA2 0PJ.

## 2. What we do not do

The Royal Osteoporosis Society does not sell, trade or rent your personal information to others, for marketing purposes or otherwise. Please see our Supporter Charter for more information.

We do not conduct telemarketing, but you may receive calls from us for administrative purposes, for example to check the accuracy of our records and update your details, or in connection with your donation or membership.

## 3. How we use your information

This section outlines how we use your information based on your interactions with the charity. We have also outlined the **legal basis** we rely on under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to process your information.

### a. If you are a member or health professional member

We use the information you have given to us as part of your Membership Registration in order to provide you with the Membership benefits that you are paying for. We process your personal data in order to fulfil this contractual obligation.

Some examples of how we use your personal data:

- Using your name and address to post you a copy of Osteoporosis News magazine
- Using your bank details to process the payment for your membership
- Providing you with information about changes to our services and to inform you about other similar services we offer as part of your membership
- Using your date of birth to send you a birthday card.
- Sending you Osteoporosis Review if you are a Health Professional Member.

We rely on your **consent** to send you further information about the charity, including fundraising appeals etc. When you sign up as a member we give you the option to **opt-in** to these further communications. You will only receive these additional communications if you opt-in and you can opt-out at any time.

Alternatively, if you fall into another category outlined in this policy we may process your personal data for other purposes.

#### **b. If you are a volunteer**

This includes: trustees, ambassadors, volunteers on committees and teams, and other types of volunteers and friends of the charity.

We use the information you have provided as part of your Volunteer Application Form to:

- process your references, where applicable,
- contact you about your volunteer role,
- send you Volunteer Network News and other updated relevant documents relating to your role by email or post whilst you are a volunteer,
- We will hold your contact details and the details of your volunteer role for 6 years after your last day in order to keep a record of your volunteer experience with us, and to resolve any complaints
- We give you the opportunity to opt-in to other communications which may be of interest to you as a volunteer and we will only send these to you if you give your consent.

We rely on **legitimate interest** in order to process your data for the purposes of acting as a volunteer. However, for Trustees we also have a legal obligation to collect certain types of information.

#### **c. If you are a healthcare professional or corporate partner**

We use the contact details you give us when you sign up to attend events, contact us concerning the training we offer or other partnership opportunities, to provide you with information about future training, events, professional development and partnership

opportunities which we believe may be of interest to you. We rely on your **legitimate interest** to do this and have completed a balancing exercise to ensure that your privacy rights are protected. Most of this communication falls under the category of business to business marketing.

You can unsubscribe and **opt-out** from receiving these communications at any time.

As a healthcare professional you may also make a donation or volunteer for the charity, please see the other categories for further information about how your information will be processed.

Your payment details will be used only to process your payment for events or training.

**d. If you have given a donation to the charity**

We will use the payment details you have provided to process the donation. If you have consented to Gift Aid we will also record and process this information for the purpose of claiming Gift Aid.

If your donation exceeds £500 we may collect additional information about you from public sources. For example, we may collect information from:

- Public registers, such as the electoral roll or Companies House
- Articles about you in newspapers or magazines, including the Sunday Times Rich List.
- Internet search engine results
- Wikipedia
- Public posts on social media sites such as LinkedIn, Twitter, and Facebook
- The Charity Commission website
- Google Maps
- Company websites
- Public blogs
- Public records of other charities or organisations you might be affiliated with
- Websites you manage or websites containing information about you
- Professional registers, e.g. healthcare professionals, Solicitors, Accountants, Livery Companies Guide.

We will use this information to tailor our conversations with you, and invite you to appropriate events, sending you details of opportunities to get involved which relate to your areas of interest.

If you give over £1000 you may be contacted by the charity concerning opportunities to hear how your donations are making a

difference and receive invitations to special events. We will call you to discuss the opportunity of becoming a Patron of the charity. However, please note that we will not contact you if you have previously opted out of receiving communications from the charity.

If you agree to become a Patron, you will receive personalised communications keeping you informed of the work of the charity.

We will rely on **legitimate interest** to process your data and communicate with you, and you can **opt-out** or object to this use of your information at any time.

**e. If you have signed up to participate in a fundraising or information event**

We will use the information you have provided to communicate with you about the event you are participating in, and also about future events that you may be interested in. We rely on **your legitimate interest** to do this.

In addition, we may receive your contact details from a third party with whom you have registered for the purpose of raising money for the charity. In this case we will use the registration details provided by the event organiser to send you information about the event and about your fundraising activities. For example, if you choose to raise money for us through an online fundraising portal such as JustGiving and give consent for them to share your information with us we will receive your data in line with their privacy policy and use it to keep in touch with you about your fundraising.

**f. If you are or have been an employee of the charity**

- i. See separate Employee Privacy Notice
- ii. If you are applying for a job at the charity you will find our Applicant Privacy Notice available [here](#).

**g. If you call our helpline**

We will record your call, unless you request that we do not, this is in line with our Call Recording Policy. We rely on our **legitimate interest** to record your call as we are able to enhance the service we provide by listening back to calls, and better identify safeguarding issues in line with our Safeguarding Policy. All calls are deleted from our system after 6 months and are only accessible to limited charity employees for training and quality purposes.

As part of your call we may invite you to **opt-in** to further communications from the charity that may be of benefit to you in helping you take care of your bone health, and to find out more about other charity activities. We rely on your **consent** to send you these communications and if we do not have it we will not contact you.

We will also gather anonymous information related to your age bracket, gender, and ethnicity in order to gain a greater understanding of those accessing our support services. This information is stored separately to any other information we may hold about you and is used purely to provide statistical reporting and enhance the service on offer.

If you request an information booklet as part of the call, we will rely on **legitimate interest** to send you an invitation to become a Member of the charity. There is no obligation to sign up and this is the only additional information we will send to you unless you have given us your consent to send further charity communications.

**h. If you are a corporate partner or prospective partner**

We will contact you using information that is publicly available on your website, or information that you have provided to a charity representative in order to contact you about potential ways in which we can work together.

We also rely on **legitimate interest** to send those identified as corporate partners news and updates. These will only be sent to those who have registered interest in working with the charity and have an interest in receiving these updates. They provide you with information about the work of the charity and potential partnership opportunities. You can unsubscribe at any time via the link in the email.

**i. If you attend a Support Group**

We will only contact you about local support group activities when you have given us your consent to do so.

We will only use your information for other purposes if you have given your consent or you fall into other criteria as outlined in this policy.

You can **opt-out** from local support group activity and events information at any time and your information will be retained in line with our Data Protection Policy.

**j. If you use our website**

Our website uses cookies, which are small bits of data downloaded on to your device, to enable our website to function properly and to distinguish you from other users of our website.

The cookies we use also help us to improve our site, to make the information provided more relevant to you and to provide you with a good experience when you browse our website.

There is a notification for all website users that states that cookies will be collected if you use the website.

When you visit our website, the following information may be collected automatically:

- Technical information, including the IP address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and the type of device you are using;
- Information about your visit, including the route into and through our site, length of visit and pages you viewed;

We will use this information:

- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them;
- in order to gain a better understanding of our supporters and beneficiaries to enable us to improve our services or the effectiveness of our fundraising;

Other cookies may collect information and share this with third party services, for example, Facebook, to monitor your use of our website and to tailor adverts when you use their services. In addition, when you register on the website and have your own login to access secure areas we will collect the above information in a way that associates this information with your user profile.

All personal data that you provide us with using forms on our website will be stored securely in line with our Data Protection Policy and will only be used in accordance with this policy. Further information is provided at the point at which you provide us with this information.

Please see our Cookies Policy for further information related to specific data collected when you use our website.



## **k. If you have previously attended high profile charity events**

We rely on **legitimate interest** to continue communicating with you about future events which we believe may be of interest to you. This means that we only require your consent to send you electronic marketing concerning events.

If a friend suggests we send you an invitation to an event we may send an invitation to you on their behalf. If we do this, we will make clear why we are contacting you.

In the same way as for those that have made donations over £500, we may collect additional information about you from public sources for the purpose of preparing for meetings and inviting you to events which are most appropriate to you. Section 3.d provides further information about how we use your information when you make a donation.

## **l. Other**

There may be other circumstances where we process your personal data, here are some examples:

- If you offer to share your story with the charity we may collect information in addition to your contact details, in relation to your experience of living with the condition. This may include health information. We require your **consent** to hold and process this type of information. We will give you the choice to decide whom your story is shared with and provide you with further details when you submit your information to us.
- We may keep records of our correspondence with you and may ask for feedback in order to ensure we provide you with a high-quality service.
- Where you have provided your **consent** to receive specific categories of communication, we will keep you informed about our work and how your support is making a difference.
- If you submit an application for a research grant, we will process your application which includes sharing your application with the Research Grants Committee.
- If you participate in a research project or consultation group led by the charity, in this case you will have given your consent to participate and/or applied to be part of a volunteer panel. Your personal information will be used for the purpose of inviting you to consultation events and for the purposes of the project. You may also be offered the opportunity to give your consent to receive wider charity communications which may be of interest to you.

- We may also use the information you provide us with to help detect fraud.

#### **4. Data received or shared with third-parties**

Your information may be shared with us if you have provided your **consent** or have submitted information to a third-party supplier in order that we can provide the service that you have requested. For example, a fundraising platform or company that arranges challenge events to raise charity funds.

We do not purchase any data from third party suppliers but data from other organisations may be passed to us if you have given them **consent** to have your information shared with us or where they are acting on our behalf to provide a service for you.

We work closely with our third-party suppliers to ensure that they operate in accordance with the Data Protection Act 2018, the GDPR, and this Privacy Policy. Further information can be found in our Data Protection Policy

When you submit your information to a third party it is important to check their Privacy Policy for details of how they use your data before submitting your personal information.

#### **5. How we store your personal data and keep it safe**

All of the information you provide to us is stored on our secure servers and we ensure we have the necessary technical and organisational measures in place to protect your data. Any donations you give will be encrypted using SSL technology.

The data that we collect from you may be stored in the cloud on a server outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers for among other things, the fulfilment of donations, the processing of your payment details, the mailing of communications and the provision of other services. We will check that any suppliers outside of EEA are recognised by the European Union as providing adequate protection of your data and if they are not we will take all steps reasonably necessary to ensure that there are adequate safeguards and protections in place to ensure your data is treated securely and in accordance with the law, this privacy policy and our other data protection policies.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Our Data Protection Policy outlines how we protect your information, how long we keep it, and also some further detail around making a subject access request. We also have an Information Security Policy for Payments by card.

## **6. Your Rights**

The GDPR provides you with the following rights:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure, unless your data is being processed in line with a legal requirement
5. The right to restrict processing, except for processing related to a legal requirement
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Wherever we are collecting information about you we will explain to you why we are collecting that information, and what we will do with it.

If you have any questions about how we handle your information or want to find out more about your rights as outlined above, please do not hesitate to contact us.

You can also contact the Information Commissioner's Office if you want to:

- Find out more about your rights,
- Make a complaint or raise a concern about the processing of your personal data

Contact details can be found here: <https://ico.org.uk/concerns>

## **7. Changes to our Privacy Policy**

Any future changes we make to our privacy policy will be posted on our website and, where appropriate, notified to you by email or post. Please check back frequently to see any updates or changes to our Privacy Policy.

## **8. Contact us**

Please contact us if you wish to amend your communication preferences, update your contact information or to see what information we hold about you.

Membership & Supporter Team  
Royal Osteoporosis Society  
FREEPOST RTJH-ERRL-ZEBK

Manor Farm  
Skinners Hill  
Camerton  
Bath  
BA2 0PJ

or email us: [supporters@theros.org.uk](mailto:supporters@theros.org.uk)

or call us on 01761 473287.

Any questions, comments or requests regarding this Privacy Policy are welcomed and should be addressed to:

**Data Protection Officer,**  
Juliette Morgan,  
Head of Corporate Governance  
Royal Osteoporosis Society,  
Manor Farm,  
Camerton  
BA2 0PJ.

Or by email to [dataprotection@theros.org.uk](mailto:dataprotection@theros.org.uk)

## Appendix A: Glossary

**Personal data:** information which identifies a living individual, is biographical or which has the individual as its focus and which affects the privacy of that individual, either in a personal or professional capacity. Any expression of opinion about the individual or any indication of the intentions of any person in respect of the individual will be personal data.

Provided the information in question can be linked to an identifiable individual, the following are likely to be examples of personal data:

- an individual's salary or other financial information
- information about an individual's family life or personal circumstances,
- employment or personal circumstances, any opinion about an individual's state of mind

The following are examples of information, which will not normally be personal data:

- mere reference to a person's name, where the name is not associated with any other personal information
- incidental reference in the minutes of a business meeting of an individual's attendance at that meeting in an official capacity
- where an individual's names appears on a document or email indicating only that it has been sent or copied to that particular individual
- the content of that document or email does not amount to personal data about the individual unless there is other information about the individual in it.

**Legal Basis:** in order to process personal data we must have a valid lawful basis to do so. There are six lawful basis which can be relied upon to process your personal data, and we must clearly identify which basis we are relying on.

**Contractual Basis:** this is a legal basis we can rely on when processing your personal data in the context of us fulfilling our contractual obligations, or for us to provide you with information before we enter into a contract.

**Consent:** means we can only use your information for a specific purpose if you have given us your explicit consent. We may ask for your consent verbally, or in writing, in paper form or electronically.

We will ask you for your consent before we send you information about fundraising appeals and other similar communications. This is to make sure you only receive the information you want.

**Opt-in:** We will invite you to opt-in to some specific charity communications, this means you need to tick a box or give us your verbal consent to proceed. We will keep a record of this in order that we are sure that we have your consent.

**Opt-out:** This refers to your opportunity to unsubscribe from charity mailings. An exception would be when we are processing your personal data to fulfil a request, for example, the processing of a donation.

You can opt-out by following the instructions given to you, or you can ring our Membership Team on 01761 473287 or use the unsubscribe link on your email.

**Legitimate Interest:** This is one of the six lawful bases that we can rely upon to process your personal data. When we rely on your legitimate interest we have documented our approach, considered your privacy rights and concluded that we can communicate with you according to your previous engagement with the charity, or your business or professional interests.