

SUCCESS Privacy and Cookies Policy

We understand the importance of protecting the privacy and security of your personal information and undertake to safeguard all personal information that we collect.

SUCCESS is an allocated charitable fund within UCLH Charity. If you are donor, supporter or beneficiary of SUCCESS, or a user of our website, the following policy will describe the types of personal information we collect, how we use that information, who we share it with, and how we protect that information. If you are using our website, this policy also describes how we use cookies on our website.

1. Who are we?

For the purposes of applicable data protection laws, the data controller is UCLH Charity of 5th Floor East, 250 Euston Road, London NW1 2PG. UCLH Charity is registered under the charity number 1165398.

2. What personal information do we collect about you and how do we collect it?

We may collect information about you from the following sources:

2.1 Information we receive from you

We may collect personal information (such as your name, date of birth, gender, email address, postal address, telephone number, financial information, including whether you are a UK tax payer, and (if you are a beneficiary of SUCCESS) certain health information) that you provide to us when you:

- sign up to our newsletter and other messages from us;
- make a donation to SUCCESS;
- fill out our forms and agree to be a beneficiary of SUCCESS (for example, this may include if you consent to SUCCESS putting you in touch with other survivors and their families, or if you request tools advice, information and advocacy from SUCCESS to facilitate rehabilitation); and correspond with us, including when you contact UCLH Charity personnel or anyone connected to SUCCESS, using any form of communication to enquire about our activities, make a donation or fundraise for us.

2.2 Information we collect about you

We may collect personal data which relates to you from third parties.

Your information may be shared with us by fundraising sites like Charity Checkout, JustGiving or Virgin Money. These independent third parties will only do this when you have specified that you wish to support SUCCESS and with your clear consent. They have their own privacy policy and if you wish to know more you should contact them on how they will process your data.

We use third parties to collect data on our behalf to support our activities. This might include running raffles, event registrations and processing your donations, and ensuring our records are as up to date as possible through running address and detail verification checks.

Depending on your settings or the privacy policies for other online services like Facebook or Twitter, you might give us permission to access information from those accounts or services. The information we get from those online services depends on your personal settings, and therefore it is recommended that you check them regularly.

When you visit our website, we may use cookies and other technologies to automatically collect the following information:

- Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- Information about your visit, including the websites you visit before and after our website and products you viewed or searched for; and
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

To learn more about how we use cookies and how to control which cookies are used, please see our Cookies section below.

3. How do we use your personal information?

We may use your personal information to:	What is the legal basis for us processing your personal information this way?
Providing practical tools advice, information and advocacy to facilitate rehabilitation of survivors and prepare them for adulthood and independence or supported living.	We will ask for your explicit consent before processing your personal information in this way.
Creating a circle of supportive professional, family, and peer to peer networks, survivors' events / conferences and a vibrant on line community.	We will ask for your explicit consent before processing your personal information in this way.
To process a donation you have made, and keep a record of donations and actions taken by our supporters and our communications with them.	It is in our legitimate interests to process your personal information in this way. This may also be necessary to comply with our legal obligations.
To claim gift aid on donations.	It is in our legitimate interests to process your personal information in this way.
To send our supporters our newsletter and information about our projects, fundraising activities, volunteering, campaigns and appeals.	We will ask for your consent before processing your information in this way.
To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted.	This is necessary to comply with our legal obligations.
To help you with creating an online donation account.	It is in our legitimate interests to process your personal information in this way.
To process entries into a prize draw or raffle.	We will ask for your consent before processing your information in this way.
To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is	It is in our legitimate interests to process your personal information in this way.

We may use your personal information to:	What is the legal basis for us processing your personal information this way?
presented to you.	
To detect and reduce fraud and credit risk.	It is in our legitimate interests to process your personal information in this way.
To thank you for your support.	It is in our legitimate interests to process your personal information in this way.
To ensure statutory and regulatory compliance.	This is necessary to comply with our legal obligations.

4. How do we share your personal information with third parties?

- **Our trusted service providers:** We may sometimes share your information with our trusted service providers who are authorised to act on our behalf. We may share personal information with the following categories of service provider:
 - infrastructure and IT service providers, including for email archiving.
 - online fundraising platforms.
 - event planners.
 - external auditors and advisers.

In the course of providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with personal information which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your personal information secure.

- **Third parties permitted by law:** In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

- **Third parties connected with business transfers:** We may transfer your personal information to third parties in connection with a reorganisation or restructuring, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Policy.

We will not sell your details to any third parties.

Please note our website may, from time to time, contain links to and from the websites of our partners or service providers. Please note that these websites have their own privacy policies and we have no control over how they may use your personal information. You should check the privacy policies of third party websites before you submit any personal information to them.

5. Do we transfer personal information outside the EEA?

Your personal information may be transferred to and processed in outside the EEA by our service providers. We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy as well as applicable data

protection laws, including, where relevant, by entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA (available here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

6. How do we keep your data safe?

We have implemented appropriate technical and organisational security measures to safeguard the personal information in our custody and control. Such measures include, for example, limiting access to personal information only to staff / employees and authorised service providers who need to know such information for the purposes described in this Privacy Policy, carrying out reviews to establish who has access to information that we hold, and ensuring that your information is only accessible by appropriately trained and authorised personnel.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

7. How long do we keep your personal information?

We will keep your data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. We will take into consideration our legal obligations and tax and accounting rules when determining how long we should retain your information.

When we no longer need to retain your information we will ensure it is securely disposed of, at the appropriate time and/or take steps to anonymise it so that you can no longer be identified from it. In the meantime we ensure appropriate technical controls are in place to safeguard your personal details.

8. Children's privacy

We will never knowingly collect personal information from individuals under the age of 16 years without first obtaining verifiable parental consent. If you are under the age of 16, you should not provide information to us. If we become aware that a person under 16 has provided personal information to us without verifiable parental consent, we will remove such personal information from our files.

9. What are your rights (EEA residents only)?

If you are a resident in the European Economic Area, you have the following rights (if applicable):

- **Access.** You have the right to request a copy of the personal information we are processing about you.
- **Rectification.** You have the right to have incomplete or inaccurate personal information that we process about you rectified.
- **Deletion.** You have the right to request that we delete personal information that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict our processing of your personal information where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- **Portability.** You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this

is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.

- **Objection.** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. This includes where you wish to opt out from marketing messages.

You can make a request to exercise any of these rights in relation to your personal information by sending the request by mail to the Administrator, SUCCESS, UCLH Charity of 5th Floor East, 250 Euston Road, London NW1 2PG or email to Admin@successcharity.org. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:

Telephone: +44 0303 123 1113
Email: casework@ico.org.uk
Website: www.ico.org.uk
Web-form: www.ico.org.uk/concerns/
Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

If you are based in, or the issue you would like to complain about took place, elsewhere in the European Economic Area (EEA), a list of local data protection authorities in the other EEA countries is available here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

10. How can you contact us?

If there are any questions or concerns regarding this Privacy Policy, please contact us as follows:

- by email: Admin@successcharity.org
- by post: the Administrator, SUCCESS, UCLH Charity, 5th Floor East, 250 Euston Road, London NW1 2PG]

11. Cookies

Our website uses cookies and similar technology. A cookie is a small file of letters and numbers that our website places on your computer, or other equipment which you use to access our website. These cookies allow us to distinguish you from other users of our website.

The information gathered from cookies help us to: review how our website is being used and therefore help us to improve our website and online services; simplify your ability to navigate through the website; personalise and improve the service offered to you by understanding your preferences and establishing which areas of the website are most relevant to you; and know if the website is operating effectively.

Type of cookie	What does it do?
Strictly necessary	These cookies are essential in order to enable you to move around the

Type of cookie	What does it do?
cookies	website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like room bookings or e-payment, cannot be provided.
Performance cookies	These cookies collect information about how you use our website, for instance which pages you go to most often, and if you receive error messages from certain web pages. These cookies do not collect information that identifies you. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the website works. By using our website, you agree that we can place these types of cookies on your device.
Functionality cookies	These cookies allow the website to remember choices you make (such as your language of choice or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of the web pages that you can customise. The information these cookies collect may be anonymised and they cannot track your browsing activity on websites operated by third parties. By using our website, you agree that we can place these types of cookies on your device.

Your use of our website indicates your consent to the cookies described in this policy.

If you want to control cookies, your web browser includes an option that allows you to refuse the setting of all or some cookies. However, if you do so, you may not be able to access parts of our website and it may make your browsing experience less enjoyable. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as described above when you access our website. If you would like to delete any cookies on your computer please refer to your browser manufacturer's instructions by clicking 'help' in your browser menu.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

12. Changes to this policy

We may change this policy from time to time, if we were to make significant changes to the policy, we will highlight this clearly in our website or we may contact you directly.

Last updated: October 2018

UCLH Charity is registered with Fundraising Regulator.



