

Combined Privacy Statement: Retail and Fundraising

Introduction

At Dorothy House, we are committed to protecting your personal information and being transparent about how we use it. This privacy statement outlines how we collect, store, and use your data in relation to our retail and fundraising activities. Creating and maintaining up-to-date profiles of supporters ensures we can interact with you in the most appropriate ways.

We are the controller of the personal information we collect, which means we decide how and why your data is used and are responsible for ensuring it is handled in line with data protection law.

What Information We Collect

We may collect personal information including your name, contact details, donation history, purchase history, communication preferences, and interactions with our services. This information may be collected directly from you or through your interactions with our website, shops, events, trusted third party platforms or campaigns.

How We Use Your Information

We use your information to:

Purpose	Lawful Basis
Process donations, purchases, and Gift Aid claims	Contract and Legal Obligation (for Gift Aid claims, for purchases and donations)
Communicate with you about our work, fundraising appeals, events, and retail promotions	Consent (where you have opted in) or Legitimate Interest (where we believe the communication is relevant and beneficial, and does not override your rights)
Understand your interests and preferences to improve our services and communications	Legitimate Interest (to ensure our services and messages are relevant and engaging)
Manage your relationship with us effectively and respectfully	Legitimate Interest (to maintain a positive and supportive relationship with supporters)

Data Storage and Analysis

Dorothy House is committed to handling your personal data with lawfulness, fairness and transparency. Your information is stored securely within our Customer Relationship Management (CRM) systems, which enable us to manage our interactions with supporters and customers efficiently and effectively.

We employ data analysis tools, including machine learning (AI) and trusted third-party services to better understand supporter behaviours, preferences, and potential to support our charitable aims. This includes the use of techniques such as supporter profiling, supporter research including wealth screening and propensity scoring to help us tailor our communications and fundraising efforts in a respectful, relevant, and meaningful way.

We only use information that you have provided to us directly or that is publicly available. You have the right to opt out of this analysis at any time.



Access to our secure donor databases is strictly limited to authorised Dorothy House workforce and trusted partners who require the information to fulfil legal, financial, or donor care responsibilities

We use third-party services to manage and send our email communications. In addition, we may engage with external platforms—such as fundraising or e-commerce sites—that operate their own independent marketing systems.

When you interact with us via these platforms, your data may be processed in accordance with their privacy policies and the permissions you have provided. We ensure that all data use complies with applicable data protection laws.

We use analytics tools to help us understand how people use our website and digital services. These tools collect information like:

- Pages visited and time spent on them
- Device type, browser, and operating system
- General location (e.g. city or region)
- How you arrived at our site (e.g. via search engine or link)

We use this data to improve our website, tailor content, and measure the effectiveness of our communications and campaigns.

Our website also uses cookies and similar tracking technologies to enhance your experience, remember your preferences, and support essential site functions. Some cookies are set by third-party services we use, such as embedded videos or donation platforms.

You can manage your cookie preferences at any time through our cookie banner or your browser settings. For more details, please see detailed information on Cookies below or, read our full cookies policy [here](#) or contact us at info.governance@dorothyhouse-hospice.org.uk.

Cookies

We use a third-party provider for our cookie consent management tool. This solution offers a breakdown of how cookies are used across our website. The provider does not collect, store, or process personally identifiable information such as names, email addresses, or any other sensitive data that could directly identify individual users.



You have the right to object to tracking and opt out. You can do this by selecting the 'Reject All' option on our website's cookie banner when you visit.

Analytics Cookies

Our site uses cookies to help understand visitor behaviour, including identifying returning users and tracking session activity. These cookies may update with each visit to ensure accurate analytics.

Please note that we do not have access to any personal data collected through these analytics tools, and therefore are not considered the Data Controller for this information. To learn more or exercise your rights regarding these tools, you would need to contact the analytics provider directly.

Marketing Cookies

We use marketing pixels on specific pages of our website to support targeted advertising efforts. These pixels enable advertising partners to display relevant content to users who have interacted with our fundraising materials.

The pixel tracks page engagement, securely shares data in an encrypted format, and helps create audiences based on shared characteristics with existing supporters. Unmatched data is deleted. These pixels will only activate after users have consented to marketing/targeting cookies through our website's cookie banner.

Marketing pixels are restricted to specific pages and do not operate across the entire site.

You can read more about cookies and manage your preferences in the "Website Users" section of our full Privacy Policy.

Newsletter Distribution

Our newsletter is sent to supporters who have opted in to receive communications from us. In addition, it may also be distributed to a general audience that we believe it may be of interest to and we have a legal basis on which to share it. We ensure that all communications are sent in compliance with data protection regulations and respect individual preferences.

Lawful Basis for Processing

We process your data under the lawful bases of legitimate interest, consent, and legal obligation, depending on the nature of the interaction. You have the right to object to

processing based on legitimate interest at any time by visiting our webpage, phoning 01225 721 480 or by emailing: preferences@dorothyhouse-hospice.org.uk

We process your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and where applicable, the Data (Use and Access) Act 2025.

Data Retention

- We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for legal, accounting, or reporting requirements. Retention periods may vary depending on the type of information:
 - **Gift Aid records:** kept for 7 years after the end of the financial year in which the donation was made (HMRC requirement) – for legacy payments this is kept for 12 years
 - **Supporter relationship data:** Retained for up to 7 years after your last interaction with us
 - **Financial transactions:** Retained for 7 years in line with accounting obligations

Data Retention

We manage data across the following main categories:

Category	Description
Active Data	Supporters who have opted into communications or made a donation within the last 7 years.
Archived Data	Supporters who made a donation more than 5 years ago, but less than 7 years ago, and have not donated since; are also communication no.

Additionally, specific types of data are retained as follows:

Data Type	Retention Period
Gift Aid records	Retained for 7 years after the end of the financial year in which the donation was made (HMRC requirement).
Legacy gift records	Retained for 12 years to comply with legal obligations related to estate administration.
Financial transaction records	Retained for 7 years in line with accounting and audit obligations.

When personal data is no longer required, it will be securely deleted or anonymised so that it can no longer be linked to you.

Data Sharing

We do not sell or share your personal data with third parties for their own marketing purposes.

We may share your data with trusted service providers who support our operations, under strict data processing agreements, which means that they can only use your data according to our instructions

International Data Transfers

In certain circumstances, personal data may be transferred outside the United Kingdom (UK) and/or the European Economic Area (EEA). These transfers are referred to as **restricted transfers** under the UK GDPR.

To ensure that such transfers are lawful and that individuals' data remains protected, we implement the following **international safeguards**:

Adequacy Decisions

Transfers may be made to countries or territories that the UK Government has deemed to provide an adequate level of data protection. These include countries such as

Canada (with exceptions), Japan, New Zealand, and the United States (only for organisations certified under the UK Extension to the EU-US Data Privacy Framework).

Your Rights

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, you have a range of rights in relation to your personal data. These include:

- **Right to Access** – You can request a copy of the personal data we hold about you.
- **Right to Rectification** – You can ask us to correct inaccurate or incomplete data.
- **Right to Erasure** – You can request that we delete your personal data, subject to certain conditions.
- **Right to Restrict Processing** – You can ask us to limit how we use your data in certain circumstances.
- **Right to Object** – You can object to processing based on legitimate interests or direct marketing.
- **Right to Data Portability** – You can request your data in a structured, commonly used format to transfer to another provider.
- **Rights Related to Consent** – Where we rely on your consent to process data, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.
- **Rights Related to Automated Decision-Making and Profiling** – If we use automated systems to make decisions that have legal or similarly significant effects on you, you have the right to:
 - Be informed about the decision-making process
 - Request human intervention
 - Express your point of view

Contest the decision

(Note: We will only use automated decision-making where permitted by law or with your explicit consent. If this does not apply to our organisation, this will be clearly stated.)

Limitations and Exemptions

Some of these rights may not apply in all circumstances. For example:

- Requests may be refused if they are manifestly unfounded or excessive.
- Certain exemptions apply under the Data Protection Act 2018, such as:
 - Legal professional privilege
 - Management forecasting
 - Negotiations with the data subject
 - Public interest or law enforcement purposes

We will always assess requests on a case-by-case basis and explain clearly if an exemption applies

Right to Complain

You have the right to access, correct, or delete your personal data, and to object to or restrict certain types of processing. You can read about this in detail within our Privacy Policy in the “See your rights” section”. Additionally, to make a request, please contact us at info.governance@dorothyhouse-hospice.org.uk or call 01225 722 988.

If you are unhappy with how we handle your personal data, you have the right to lodge a complaint with the UK’s supervisory authority:

Information Commissioner’s Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: **0303 123 1113**

www.ico.org.uk^[3]

We encourage you to contact us first to resolve any concerns before approaching the ICO