



Policy contact:	Nathaniel Crowley, Trustee
Approved by:	The Board of Trustees of the Miranda Brawn Diversity Leadership Foundation
Chair of the Board of Trustees:	Dr. Miranda Brawn (the “Chair”)
Date effective:	June 2020
Last reviewed or updated:	June 2020
Frequency of review:	Every year



POLICY TITLE:

The Miranda Brawn Diversity Leadership Foundation Privacy Policy

POLICY STATEMENT:

Without your support, TMBDLF will not be able to achieve our goals and mission. Because of that, we want to ensure that you know you can trust us, and – in particular – trust how we use your personal information that is given to us. This policy explains how we collect information, how we use it, and how we keep it safe.

In particular, this policy describes:

1. The reasons why we need to collect information
2. How we use this information
3. The ways in which we collect information
4. How we will not use your information
5. How long we will keep your information for
6. An explanation of our marketing, and your rights when it comes to us staying in touch, including any profiling and screening activity we carry out
7. How we share information with suppliers and contractors working for us, and our policy on sharing information outside our organisation
8. Your rights to opting out of our communications, asking to see what information we hold about you and amending or erasing your details
9. How to get in touch
10. Updates to this policy

Why we collect information

Information (or data) is at the heart of what we do as an organisation. It means we can function as a charity and do things like collecting donations, claiming Gift Aid, running our programmes and the annual lecture and keeping in touch with you. It allows us to keep track of how you personally prefer to be contacted (and what kinds of contact you don't want) so we know how to communicate and how not to communicate with you.

How we use information we collect from you

The principal methods by which we use the information you provide to us is to complete and action or deliver a product or service to you that you have reasonably requested. This may include (without limitation) processing a donation (including claiming Gift Aid, where you have asked that we do this),



delivering programmes and training, running our memberships programmes and conduct research. We will also use your information to help provide you with goods and services that you have bought or requested from us.

We may also use the information you have provided to get in touch with you about our work, unless you have specifically told us not to. Please note that we will not send you emails or text messages about our work unless you have specifically asked us to.

How we collect information

We collect information when you:

Make a donation to us, either by post, online (either directly or by using a third party donation platform such as JustGiving), over the phone or via SMS/text donation. We also collect information about you when you make a donation to us through setting up a standing order or Direct Debit, or donating via payroll giving (Give As You Earn).

In addition when you:

- become a volunteer;
- apply for Scholarship;
- act as a Mentor or Mentee;
- respond to one of our postal mailings or emails or social media campaigns (where you send a specific message or request);
- complete a campaign action online (signing a petition, for example);
- sign up to any newsletter we publish;
- sign up to one of our events;
- agree to or enquire about leaving a legacy, an in-memory or a tribute donation;
- cookie information when you visit our website;
- sign up to work with us during an event;
- interact with us over the phone, or on social media;
- when you apply to work or volunteer for TMBDLF;
- contact TMBDLF through our information service by phone or email; and/or
- interact with us in some other way.

How we will not use the information we collect from you

We will never sell your data, and we will never share it with other organisations for the purposes of their own marketing. We are not involved in any data swapping schemes.



How long we keep information for

Our standard practice is to only hold your data for as long as it is required. This will vary depending on the activity for which the data is being used. However, we are wholly aware of our obligations under the UK Data Protection Act 2018 (the “**DPA**”) and the EU General Data Protection Regulation¹ (“**GDPR**” and together with the DPA, the “**Data Protection Regime**”), and we make every effort to ensure that we only hold on to your data for as long as it is required.

In terms of physical records, by law we are required to retain information related to donations (such as donation forms and correspondence) for seven years (six years from the end of the financial year it is collected), at which time it gets securely destroyed.

We also use a supporter database to keep a record of your interactions with us. This includes financial information such as donation history or non-financial information.

Because data is such a key part of helping us to achieve our goals, we have set out the following retention schedule:

- Where you have made a financial contribution or commitment to our work, as a donation, legacy gift or otherwise, we will retain your information indefinitely (unless otherwise requested). We have made this decision for two reasons – firstly because it helps us to identify the context surrounding legacy donations. Another reason is that in our experience, it is worthwhile investing in re-engaging supporters in these groups.
- Where you do not fall into one of these groups (for instance, if you have only ever signed one of our petitions) we will retain your information for a period of time we feel proportionate to our business aims and your level of engagement.

It is, of course, your right to ask that your information is erased from our records whenever you wish, but please be aware that when we do, we will lose all of your preferences, including requests to opt out from certain types of communications. See information below about your rights.

Marketing, profiling and screening

As a charity that invests responsibly in fundraising, we operate a number of programmes to raise money from individuals. This includes sending you letters and other sorts of mail, emails, calling you on the phone and sending you text messages. The law varies depending on the channel we use to get in touch with you, but in line with our obligations according to the Data Protection Regime, we may contact you as follows:

- **Post:** we send post to our supporters except where you have specifically told us you don’t want to receive post from us. If you want to stop receiving postal mailings from us, you can

¹ Or, following 31 December 2020 (assuming no extension to the UK’s transition period under the Withdrawal Agreement with the European Union), the UK Data Protection Act 2018, as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.



always let us know or you can opt out through the Fundraising Preference Service². We aim to act on your request within two weeks of receipt, but it can take up to three months for you to stop receiving mailings from the time you send us your request.

- **Email:** we plan to send out a number of email alerts to keep you up to date with our work, and to let you know how you can help. You may be included on several mailing lists through your various connections to TMBDLF. If you would like to unsubscribe from one specific list, please email us with 'unsubscribe' in the subject header of the relevant email. Alternatively, you can unsubscribe from all email communication by contacting info@mirandabrawn.com.

If you have changed any of your contact details, please contact info@mirandabrawn.com.

For more information about your data please see your rights.

- **Phone:** we find telephone fundraising a really effective way to connect with our supporters, so we may occasionally call you to let you know about additional ways of supporting our work if you have provided us with your telephone number. Phone calls may be recorded for training and quality purposes.

You can opt out of receiving fundraising phone calls by letting us know, or you can opt out through the Fundraising Preference Service.

We try to action all opt-out requests as quickly as possible but we do produce telephone calling files in advance to save on costs. We will action requests to be removed from calling lists as soon as possible, but it can take up to three months from the time of your request for you to stop receiving calls.

- **SMS:** where you have provided us with a mobile phone number, we may also send you text messages about our work, but only if you have specifically asked us to.

If you would like to opt out, you can either reply to our messages with a request to opt out, let us know or opt out via the Fundraising Preference Service³. Text requests to opt out will be actioned as soon as possible, but it can take up to three months from the time of your request for you to stop receiving texts.

Profiling

In order to make our messages to you more relevant, we may use your personal information to create a profile of your interests and preferences. What this means is that we could use pieces of information you have either given us directly (such as your age or location) or your behaviour (your donation history, including the amount, frequency and method through which you give, or any campaign actions you have taken, including signing petitions) to create a profile. This not only gives us an idea of who our supporters are, but also helps to make sure that when we get in touch with

² <https://www.fundraisingregulator.org.uk/complaints/fundraising-preference-service>

³ <https://www.fundraisingregulator.org.uk/complaints/fundraising-preference-service>



you or ask you to take an action on our behalf, it is done in a way which is relevant and tailored to you.

This enables us to identify supporters who are likely to be able to help us either in a financial or non-financial capacity, and it is also an effective way for us to maximise the use of our marketing budget, so we are able to help further our cause with the resources we have available to us.

We consider this one of our legitimate interests and as such have considered our position carefully to ensure that any activity is implemented in a fair and balanced way, taking into account your rights as an individual. It is your right to opt out of your information being used for profiling, and there is information on how to do this at the end of this section.

Screening

Additionally, as part of our legitimate interests, we have considered that screening is an effective way for us to ensure that we are contacting you with appropriate and relevant messages. We operate a number of different programmes to nurture support and want to make sure that when we make a request of any of our supporters, it's an appropriate one. As such, we may – where deemed appropriate – make use of third-party wealth screening companies who combine information we provide with publicly available information to help us determine which of our supporter programmes any particular supporter is best suited for.

It is your right to opt out of your information being used for any sort of profiling and screening. If you would like to do this, please send a request to info@mirandabrawn.com.

Publicly available information

As part of the work we do, we occasionally carry out research of our own to identify individuals in the public spotlight who may be interested in supporting TMBDLF, and also to gain additional insight into current supporters of significant public standing. This practice, known as desk research, makes use of publicly available information through sources such as published rich lists, newspapers and corporate websites, and aids us in identifying opportunities for new major donors, event sponsorship, corporate partnerships, event speakers and media opportunities.

We may also carry out desk research in the following areas: prospective organisations in the public, private and third sectors who may be interested in joining our programmes or scholarships.

Sharing information

So that we are able to provide you with the high level of service we pride ourselves on, and to make the most of the resources available to us, we may work with a contracted suppliers who help us carry out various important tasks. This could include sending out post or making phone calls, processing and banking donations and sending out thank you letters. As a result, when you deal with us, you can expect your information to be shared with our contracted suppliers in the manner required of us under the Data Protection Regime.



At the same time, we make use of cloud-based systems (hosted databases, email servers and service providers) to help us provide you with an optimal supporter experience. Although it is only TMBDLF personnel who use and access these systems, the information within them is securely stored on and off-site.

Your rights

As a charity, we have put this policy together to give you more control when it comes to your information and how we may use it. When considering the law in this area, you are afforded certain rights in terms of viewing the information we hold about you, correcting that information if necessary, and asking us to delete it should you like it to be erased.

In addition to this, you have the right to request that we do not use information we hold about you for the purposes of screening or profiling, and you also have the right to update marketing and fundraising communication preferences. You can do this by opting in or out.

To exercise any of your rights, please get in touch.

Accessing the information we have about you (Subject Access Requests)

You have the right to request a copy of the information we hold about you. This is known as a Subject Access Request.

To make a Subject Access Request, please make a request in writing, addressed to:

**The Miranda Brawn Diversity Leadership Foundation,
Dr. Miranda Brawn, Chair of the Board of Trustees,
Suite 81, 95 Mortimer Street,
London W1W 7GB, UK**

We may ask you to fill in a form in order to help expedite your request, prove your identity or to provide more detail regarding your request.

We aim to complete your request within two months of our receipt. We may extend the period by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

Correcting the information we hold about you

It is also your right to correct the information we hold about you, for instance, if you have changed your address or phone number.

We aim to act on these sorts of requests within a week of our receipt.

Deleting the information we hold about you



You have the right to ask us to delete the information we hold about you. Whilst we are duty bound to comply with your request, this is different from opting out and means that we will erase all history of our interaction with you, as far as our legal obligations allow. We will also lose all history of your preference requests, including opt-outs and unsubscribes. This means that if you re-engage with us in the future, we will have no record of your prior preferences and may end up contacting you according to the rules we have set out in this policy.

Please note that in line with our legal obligations, we are required to hold on to all information pertaining to donations for a period of seven years (six years from the end of the financial year it was collected). Should you wish for us to erase the information we hold about you, we will happily comply whilst retaining the bare minimum of information required for us to fulfil our statutory obligations.

Opting out of fundraising communications and profiling/screening

Even if you have given us your consent to receive marketing communications, it is your right to withdraw this consent (opt-out) at any time. We aim to act on requests of this kind as soon as possible, although because we brief and prepare our communications in advance, it can take up to three months from the time of your request for contact to cease.

In the same way, you have the right to object to any processing we carry out as a result of our legitimate interests, including any profiling or screening activity we either carry out directly or through one of our partners.