

Privacy Notice

1. Welcome

Welcome to our privacy notice ("Privacy Notice"), at Truly Giving CIC ("we, us, our,") we respect and commit to protecting our donors ("you") and associated persons' Personal Data and privacy. This Privacy Notice aims to inform you about how we collect, use, store, share and look after your Personal Data:

- a) When you interact or use our website, or
- b) If you use any of our services and or applications (together "services").

To help with working your way through this Privacy Notice, we have separated it into sections to provide an outline of the full Privacy Notice and the choice to select the section you would like to read in detail. We have also included a Glossary at the end of the Privacy Notice for some terms used (highlighted in bold).

2. About Us and Contact Details

Truly Giving CIC is a company registered in England and Wales, registered at 6 Rona Maclean Close, Epsom, Surrey KT19 8FU under company number 12972787 ("Truly Giving").

Under Applicable Data Protection Law, we are the Controller of the Personal Data we process.

Truly Giving is not required to appoint a Data Protection Officer ("DPO"). If you have any questions about this Privacy Notice or would like to know how we handle your Personal Data, please contact the hello@trulygiving.co.uk.

3. Personal Data we collect about you.

We will collect **Personal Data** about you from:

- You e.g. when you register your interest or sign up to use our services.
- your devices e.g. when you connect to our Website, use our Website.
- through cookies we use on our Websites to secure our Website, offer you personalised experiences.
- third parties such as social media platforms where you may interact with our social media pages.

The table below outlines the categories of **Personal Data** we collect and examples of the type.

Categories of Personal Data	Type of Personal Data
Contact details	Name, email address, telephone number, mobile number
Transaction details and history	Selections you choose from our services, social media information, messages or emails
Device details	Traffic information, IP address, time of access, date of access, location, web pages visited, device identifiers.
Website use data	Please see our cookie policy .
Marketing and Advertising data	Your marketing preferences and responses to our direct marketing, e.g. when and if you have open, read and deleted our marketing emails, links clicked in marketing emails.
Your communications with us	Any Personal Data you provide us when you contact us. We collect and store all copies of emails sent.

We do not knowingly collect or solicit **Personal Data** from anyone under the age of 18. If you are under 18, please do not attempt to register for our services or send any **Personal Data** about yourself to us. If we learn that we have collected **Personal Data** from a child under age 18, we will delete that information as quickly as possible.

4. How we use your Personal Data

We will use your Personal Data in the following circumstances:

- to enable you to use our services
- for our Legitimate Interest, only when your rights and freedoms do not override our legitimate interest.
- to comply with a legal and regulatory obligation
- where we have your consent. If we have relied on consent to process your personal data, you have the right to withdraw your consent at any time by contacting hello@trulygiving.co.uk

The table outlines the lawful basis we can rely on to process your Personal Data.

What we use your information for	Our legal basis for doing so
To provide you with access to our website and or our mobile app.	Legitimate Interest (To provide services to you).

To manage our relationship with you as a user of the website which includes notifying you about changes to our Websites and the services we offer.	Legitimate Interest (to keep our records updated and to study how customer use our product and services).
To provide you with information you have requested	Legitimate Interest (To provide services to you).
To respond to any enquiries from you regarding our services.	Legitimate Interest (To provide services to you).
To provide you with information about certain other services which we believe may be of interest to you.	Where we have your consent.
To send you targeted electronic communications about our services for marketing purposes.	Where we have your consent
To receive feedback from you on our services	Legitimate Interest (to help understand how we can improve our services)
To provide customer support services	Legitimate Interest (To support services to you).

Other use

We may still use aggregated and anonymised Personal Data that does not identify any individual for research and analytical purposes. We may also retain and use your information as necessary, for example, to comply with our legal obligations, resolve disputes, and enforce our agreements

We may provide Personal Data to courts, law enforcement, and governmental authorities and other third parties if required by law, subpoena, directive from a regulatory authority or as otherwise necessary to comply with legal requirements or to protect our rights or property or those of third parties. We may access, use and preserve data to comply with law, in anticipation of litigation, or to protect our rights or property or those of third parties, even if the data is subject to a deletion request from you. We may also provide information to law enforcement or authorities to protect the safety of users our services or others.

Sale, acquire, merger, or change of ownership. If we merge with another company, or our equity securities or all or a part of our assets are sold to a third party, your Personal Data may be transferred to the buyer or successor entity. We will notify all users of any transfer to a different legal entity.

5. Marketing and your Personal Data

Marketing communications to our donors

We may send e-mails to donors where we want to develop or maintain a continual relationship or if you have used or shown interest in our services previously and have not opted out of marketing.

Third Party Marketing

Before sharing your information with third parties outside Truly Giving for marketing purposes, you will need to consent and opt-in to receiving marketing communication from selected partners and third parties. Where you have consented and opted-in, your **Personal Data** may be shared with these partners and third parties and will be handled under their **Privacy Notice** on their website.

Opting out of Marketing

Where you consent to receive communication for marketing purposes, you have the right to opt-out. You can opt-out of receiving marketing communication at any time by following the opt-out links or option in any marketing messages sent to you or by contacting us any time at hello@trulygiving.co.uk.

If you opt-out of marketing, you will stop receiving marketing from us within 7 days . Please note, this does not apply to service communication, market research or customer surveys or any other processing outside marketing.

Where you consented to receive marketing from our selected partners or third parties, we do not control the use of your Personal Data by these partners and third parties. You should contact them directly to opt-out of receiving their marketing communications.

6. How we share your Personal Data

We may share your Personal Data with the following categories of third parties, which may be Controllers or Processors in respect of your Personal Data, for the purposes explained above.

- Our service providers: To help us deliver our services and ensure we offer you a fantastic service, we may share Personal Data with our providers who host our websites, provide marketing services, IT services, customer support services, data disposal services and data storage services. Where we share your Personal Data with our service providers, we enter contracts to ensure they also protect your Personal Data in line with Applicable Data Protection Law and to this Privacy Notice.
- Law enforcement and Statutory authorities: We may share your Personal Data when required by the law in the following circumstances:
 - To comply with a request for information from a governmental body such as law enforcement (police) or other public authorities.
 - To comply with a court order to disclose your Personal Data;
 - To comply with a regulatory investigation; and

- The establishment, exercise or defence of a legal claim (including in connection with an investigation or enquiry by a competent regulatory authority).
- Sharing in other circumstances: Truly Giving may transfer all your Personal Data to a third party if the operator of the Website changes, or if there is a sale of all or any part of its business or its assets or if we go out of business, enter bankruptcy, or go through some other change of control. In the event of any of these transfers occurring, the party who acquires the data will assume the rights and obligations described in this Privacy Notice.

We may have links to other sites promoting our partners. Please read their Privacy Notices available on their website to find out how they process Personal Data. This Privacy Notice will not cover their use of Personal Data.

7. Transferring your Personal Data outside the EEA

We will not transfer your Personal Data outside of the European Economic Area.

8. Retention of your Personal Data

We will not keep your Personal Data for longer than is necessary. When defining the retention period, we take several factors into consideration, the type and sensitivity of the Personal Data in question, the reason why the data was collected and processed, our legal basis for processing the Personal Data, who the Personal Data relates to and their rights and freedom. We also consider any legal and regulatory requirements to keep the data. Where we are the Processor, we will retain and dispose of the information under instructions from the Controller.

When the retention period has expired, we dispose of your Personal Data securely in the following ways, anonymisation of the data, permanently deletion (including all copies) from our systems.

If you opt-out of receiving marketing, some Personal Data will be retained and added to our suppressive list to ensure we do not market to you again.

Where we retain your Personal Data for analytics purposes, we completely anonymise the data, so that it can never be linked to you.

9. Security of your Personal Data

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

10. Your rights under Applicable Data Protection Law

Under **Applicable Data Protection Law**, you may have certain rights. The table below outlines your rights. If you would like to request to exercise your rights, please email hello@trulygiving.co.uk. Your request will be reviewed and responded to as quickly as possible.

Your rights:	Meaning:
The right to object to the processing	<p>You have the right to object to the processing of your Personal Data in certain situations.</p> <p>You have an absolute right to stop your Personal Data being used for direct marketing.</p>
The right to information	You have the right to be informed whether and to what extent we process your data. E.g. this Privacy Notice.
The right of access	You have the right to request access to your Personal Data we hold. You also have the right to request a copy, and we will provide you with this unless legal exceptions apply.
The right to rectification	If the Personal Data that we process is incomplete or incorrect, you have the right to request their completion or correction at any time.
The right to Erasure (also known as the “right to be forgotten”)	<p>You have the right to request we delete your Personal Data.</p> <p>This is not an absolute right and only applies in certain circumstances, for example, we cannot delete information if there is a legal or regulatory obligation on us to keep it.</p>
The right to restrict the processing	You have the right to request that we restrict the processing of your Personal Data in certain situations.
The right to data portability	<p>You have the right to request that we provide your Personal Data to you in a machine-readable format.</p> <p>This right can only be used where the processing relies on your consent or contract and is carried out by automated means.</p>
Your rights in relation to automated decision making and profiling	<p>You have the right to object to decisions based exclusively on the automated processing of your Personal Data.</p> <p>We do not engage in profiling or any processing related to automated decision-making activity.</p>
The right to withdraw your consent	If your Personal Data is processed based on your consent, you have the right to withdraw your consent at any time.

	If you withdraw your consent, this will not affect the lawfulness of how we used your personal data before you withdrew consent, and we will let you know if we can no longer provide you with your chosen service.
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We will keep a copy of any request. Further, we may charge a reasonable fee or refuse to act on a request if such a request is excessive, repetitive or manifestly unfounded.

If you make a request, where required, we will confirm your identity and ask you to provide us with information to help us deal with your request. We have one month from receiving your request (provided we have verified your identity) to respond.

Please note that for a complex request, we may extend the one month by two months. To exercise your rights please contact hello@trulygiving.co.uk.

Making a complaint

If you have any questions, concerns or complaints about this **Privacy Notice**, please contact hello@trulygiving.co.uk.

If you are unsatisfied with our response, you can contact the UK’s Supervisory Authority, the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, United Kingdom
SK9 5AF

Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

You can also make complaint to your local privacy supervisory authority where:

- you reside;
- you work; or
- the matter you are complaining about took place.

11. Updates to the Privacy Notice

We keep our **Privacy Notice** under regular review, and we will make new versions available on our **Privacy Notice** page on our website. This **Privacy Notice** was last updated on 31st October 2020.

12. Glossary

Term	Definition
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Applicable Data Protection Law	means all applicable worldwide legislation and regulation relating to data protection and privacy including without limitation UK and European Applicable Data Protection Law
Controller	is a person(s) or company (either alone or jointly or in common with other persons) who decides how Personal Data will be processed.
Criminal Data	Data about criminal proceedings or convictions. Criminal Data should be treated in the same way as Special Category Data.
Legitimate Interest	Processing Personal Data for our activities and needs including providing you with the best service and experience we can offer. We will balance its interests against any possible impact on to you (both positive and negative), your rights or freedom. Where our interest and needs are overridden by your interests, rights or freedom, we will not process your Personal Data (unless you provide us with your consent or required by law).
Personal Data	Information relating to an identifiable person, who can be directly or indirectly identified by reference to an identifier.
Privacy Notice	Also referred to as a Fair Processing Notice) or a Privacy Policy)– Privacy Notice is a document explaining to data subject what Personal Data is processed and how a company will process it
Processor	is an external company or other third parties that collects and processes Personal Data on behalf of a Controller. We undertake activity as both a Controller, and a Processor
Special Category Data	Also referred to as sensitive data, is defined as Personal Data relating to the following, race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.