

RSPCA Sussex Brighton & East Grinstead Branch Privacy Policy

How we respect privacy when we deal with personal information collected by our organisation.

RSPCA Branches are separately registered, volunteer run charities using a governing document approved by the national RSPCA. Our branches respect your privacy and are committed to protecting your personal data.

This notice will tell you in general terms how the RSPCA Sussex Brighton & East Grinstead Branch (the Branch) will treat the information it collects about individuals who interact with it.

Please read this privacy notice together with any other information that we may provide on specific occasions when we ask to collect or process your personal data so that you are fully aware of how and why we are using it.

The identity of the Branch is clear from its name and charity number which will be on its website and public information. See 'your local RSPCA'. The Branch is an unincorporated charity, acting through its committee of trustees as registered with the Charity Commission, is the data controller and responsible for your personal data. If you have questions about how the Branch handles your information, please contact the Branch using its contact details listed.

This privacy notice supplements any other specific notices provided by the Branch and is not intended to override them.

1. Personal data that we process

The following explains the types of data we collect and the legal basis for processing it under current data protection legislation.

If you enquire about our branch and our work, or wish to make a complaint, we will take your name, telephone contact number, email or postal address and a message. The legal basis for this may be to fulfil a contract with you (e.g. to be considered for

adoption of an animal) or legitimate interest (it is necessary for us to read and store your message so that we can respond in the way you would expect). We may have a legitimate interest in sharing some of your personal data with the national Society, who support branches in governance and administration, including complaint handling. If you wish to receive updates by email or post about our work, including fundraising updates we will take your name, email or postal address and a contact number. The legal basis for this is consent – you will need to have given us your active consent to be contacted in this way and can rescind this at any time. Further information will be given at the point we collect your data.

If you make a donation to us we will request your name, email address and postal address. In general we will not take your financial information but ask you to donate through your bank or via a third party processor (e.g Paypal or Justgiving) who are data controllers in their own right. We may thank you for your donation on the basis of legitimate interest – this is necessary for us to fulfil your intention of receiving your donation and your expectation of receiving an acknowledgement.

If you ask us to claim gift aid on your donation we will collect the information that is required by HMRC because we have a legal obligation to obtain and process gift aid forms. This applies to both monetary donations and donations made through our charity shops. If you sign up as a branch member the national RSPCA will take your name, address, email address and payment information. The legal basis for this is fulfilling a contract – by paying your membership fees and being accepted as a member, you have entered into a contractual relationship with the national RSPCA, governed by our Rules. If you consent to applying for

Branch membership, your details will be passed to the Branch and your application/membership are governed by our governing document (Branch rules).

If you ask us to rehome your animal we will take your name, address, email and contact numbers and any history relevant to the animal's welfare and behaviours, including veterinary information. The legal basis for this is performance of a contract with you to acquire the full legal title of the animal and to seek to rehome it. We may seek your consent to contact your previous vet to obtain a veterinary history.

To register you as a potential adopter or to place an animal into your home for adoption or fostering we will ask you for your name, address, email and telephone numbers along with information about your family, home and lifestyle. The legal basis for this is performance of a contract with you (the adoption agreement). As part of our adoption/fostering process we may carry out a home visit to help match you with the right animal, and a part of this process may involve us using a Google map search. This home visit may be carried out by a volunteer or a member of staff of the Branch, or another charity within the RSPCA network, who will be acting for our Branch for these purposes. In processing your application, we may collect special category data, in particular about your health, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring a suitable match between you and the animal available for adoption/fostering (e.g. fur allergy).

To process your request for financial help towards veterinary costs we will take your name, address, contact number and email and ask to see proof of means tested benefits and identification. The legal basis for this is performance of a contract with you and so we can ensure you are eligible for our charitable services and that we deliver public benefit. We will issue you with a voucher or unique reference number for use by a vet in

treating your animal
and invoicing the Branch.

If you report an animal as lost or found we may take your details directly,
or we may refer
you to Pets Located.

If we register or amend microchip details on an animal belonging to you
we will ask you for
your name, address, email and contact numbers in order to pass to the
relevant microchip
database company (principally Identibase, Anibase, Petlog). The legal
basis for this is
performance of a contract between you and the microchip company so
that if your pet is
missing, you can be reunited. For dogs microchipping is also a legal
obligation.

If we scan a microchip in a stray animal we will contact the microchip
database company and
follow their process to contact you to let you know we've found your pet.
The legal basis for this
is our legitimate interest as an animal welfare organisation in matching
stray animals with
owners. If, after taking all reasonable steps to trace an owner, we are
unable to make contact,
we will seek to rehome the animal and re-register the microchip
accordingly.

To register your interest in volunteering or applying for a job with the
branch we will
collect your name, address, email and contact telephone numbers and
ask you for details
regarding your application. Sometimes, criminal records and other
checks may be required in
line with our safeguarding and legal obligations. In processing your
application, we may collect
special category data, in particular about any disability, and we will only
process this information
on the basis of your explicit consent and specifically for the purpose of
ensuring we meet our
legal obligations (e.g to make reasonable adjustments). We may also
seek references who will
need to consent to being contacted by the Branch. Next of kin details will
also be requested if

your application is successful, as part of our legal responsibility for your safety whilst with us.

Occasionally we need to contact a third party if concerned about your vital interests (e.g in a medical emergency). We may also have a legitimate interest in sharing some of your personal data with the national RSPCA, who support branches in governance and administration, including recruitment of staff and volunteers.

We may have installed CCTV systems in some of our premises for the purposes of our legitimate interest in crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purpose of monitoring the security of our people and property.

Images captured by CCTV will not be kept for longer than necessary however, on occasions, there may be a reason to keep images for longer (e.g if a crime is being investigated). You have the right to access CCTV images of yourself. Signage advising of CCTV equipment will give notice of areas covered by CCTV.

We may use images of you and/or your pet in relation to promoting our charitable activities or fundraising. Please note that we (or our authorised partners) may film or photograph participants, volunteers and spectators attending or taking part in our events and use such footage or photographs. We do this in order to publicise our work in advertising, publications, marketing material, social media, personalised direct mail and other media that may be made available to the public.

No personal details (including names) of any under 16-year-olds will be used in any publicity materials without their written consent or that of their parent or legal guardian (depending on their age), but we may use images where children are incidentally included (for example, images

of mass participation) but will give older children, or their parents/guardians, the opportunity to

opt out.

We would ideally like to obtain your explicit consent before processing any images that would identify you directly (such as photos of you in a small group) but in mass participation events where this is not practical we would ask you to contact the branch or its photographers, who should be easy to identify, in order to opt out.

We do display images of animals that have been adopted and in the majority of cases this will not be considered as personal data. However as an adopter of an animal, you can always request at adoption that their image is not used, or that it is removed from the branch's channels at any time.

If you participate in a fundraising event that we have organised such as annual fair, dog show, raffle, competition or prize draw etc we may take your name and contact telephone number in order to administer the event. The legal basis for this is performance of a contract with you.

2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the information at the top of this policy. For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- If you are a Branch Member, we will send you an invitation to our Annual General Meeting (AGM) once a year by post, or email if you have opted in to this, and possible information updates about the charity you are a member of.

3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data

on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or

- we are required by law to share your data.
- We may also have a legitimate interest in sharing some of your personal data with third parties, in particular the national RSPCA, who as the umbrella charity supports branches in governance and administration.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required. Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
 - You have the right to ask for rectification and/or deletion of your information.
 - You have the right of access to your information.
 - You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.
- A full summary of your legal rights over your data can be found on the Information Commissioner's website [here](#).

If you would like to access the rights listed above, or any other legal rights you have over your

data under current legislation, please get in touch with us via the 'Contact Us' section of our website.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and are affected.