



GDPR

**SM17**

**WEBSITE**

**PRIVACY NOTICE**

**DATE OF LAST REVIEW:** NOVEMBER 2023  
**DATE OF NEXT REVIEW:** NOVEMBER 2025  
**AUTHOR:** Tim Hill MBE - CEO / National Director



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## **1. THE PRIVACY NOTICE**

1.1 Stella Maris (SM) formerly Apostleship of the Sea (AoS) (Registered Charity Number: 1069833) 'the Charity' is committed to protecting and respecting your privacy. For the purposes of the UK General Data Protection Regulation (the UK GDPR) and any subsequent UK legislation covering data protection, the Charity is the controller of your personal data.

1.2 This Notice sets out why we collect certain personal data and how we use it. It explains the legal basis for our processing of your personal data and the rights you have over the way it is used.

1.3 We may update this Notice from time to time. We will advertise any changes on our website or, if we make any significant changes, we will contact you with the relevant information.

1.4 If you have any questions about this Notice or the use of your personal data by the Charity, please contact the Chief Executive Officer (CEO):

CEO: Tim Hill MBE

Mobile: 07808 858 606

Email: [tim.hill@stellamarismail.org](mailto:tim.hill@stellamarismail.org)

Post: Stella Maris, 39 Eccleston Square, London, SW1V 1BX

## **2. WHAT TYPE OF PERSONAL DATA WE COLLECT**

2.1 The type of personal data we collect depends on the purposes for which we will need to use it.

2.2 The personal data we collect when you make an enquiry includes your name, email address, and phone number. We collect this data to communicate effectively with you.

2.3 If, for example, you are a supporter making a donation, volunteering, registering to fundraise, signing up for an event etc, in addition to asking for your name and contact details (your postal and email addresses and your phone number) we may also ask for your professional qualifications, position held or your volunteer role and why you chose to support our work.

2.4 All donations and payments, including those by debit or credit card, are processed securely.

2.5 If you are a grant or job applicant, the personal data you are asked to provide is as set out in the application form and is limited to the information necessary for us to consider the application.

## **3. HOW WE COLLECT YOUR PERSONAL DATA**

3.1 We may collect your personal data when you contact us or have any involvement with us, for example when you:

- 3.1.1 work for us, as either a paid employee or volunteer
- 3.1.2 visit our website (see our Cookies policy at [www.stellamaris.org.uk](http://www.stellamaris.org.uk))
- 3.1.3 donate to us or fundraise for us
- 3.1.4 enquire about our activities or services
- 3.1.5 sign up to receive news about our activities
- 3.1.6 create or update a profile [online]
- 3.1.7 post content onto our website/social media sites
- 3.1.8 volunteer for us
- 3.1.9 attend a meeting with us and/or(?) provide us with information
- 3.1.10 take part in our events
- 3.1.11 contact us in any way including online, email, phone, SMS, social media or post.
- 3.2 We may also collect your personal data when you give it to us indirectly:
  - 3.2.1 it may be shared with us by other organisations such as fundraising sites like Just Giving or Virgin Money if you are fundraising for us. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details
  - 3.2.2 it may be provided to us by other organisations if you have given them your permission to share your personal data with us. This might for example be a charity working with us or might be when you buy a product or service from a third party organisation
  - 3.2.3 it is in available on social media: Depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

#### **4. HOW WE USE YOUR PERSONAL DATA**

- 4.1 We use your personal data for a number of purposes consistent with the legal basis we rely on when processing your data. These purposes include:
  - 4.1.1 providing you with the information or services you have asked for
  - 4.1.2 processing donations you make, including processing for Gift Aid purposes
  - 4.1.3 organising volunteering activity you have told us you want to be involved in and in relation to the fundraising for us you are involved in
  - 4.1.4 sending you communications with your consent that may be of interest including marketing information about our services and activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support

- 4.1.5 when necessary for carrying out our obligations under any contract between us
- 4.1.6 seeking your views on the services or activities we carry on so that we can make improvements
- 4.1.7 maintaining our organisational records and ensuring we know how you prefer to be contacted
- 4.1.8 analysing the operation of our website to improve its usefulness (please see our Cookies Policy for more details)
- 4.1.9 processing grant or job applications
- 4.1.10 providing support to beneficiaries of the Charity's services.
- 4.2 We do not use your personal data for any automated decision-making, including profiling.

## **5. OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

5.1 The use of your personal data for the purposes set out above is lawful because one or more of the following applies:

5.1.1 where you have provided your personal data to us for the purposes of requesting information or requesting that we carry out a service for you, we will rely on the lawful basis of legitimate interests (the Charity's or of a third party) or, where appropriate, we will collect your consent. Where we collected your consent, you may withdraw it at any time by emailing us at [info@stellamarismail.org](mailto:info@stellamarismail.org) This will not affect the lawfulness of processing of your information prior to your withdrawal of consent.

It is, therefore, necessary for us to:

- 5.1.2 process your personal data to carry out our obligations under a contract entered into with you or to take steps you ask us to take prior to entering into a contract
- 5.1.3 comply with our legal obligations
- 5.1.4 rely on the fact that a particular processing purpose is necessary for our legitimate interests, or the legitimate interests of a third party. You can obtain information about the balancing test we have undertaken by contacting our Director of Development (DoD):

DoD: Adrian Gannon

Mobile: 07821 846 177

Email: [adrian.gannon@stellamarismail.org](mailto:adrian.gannon@stellamarismail.org)

Post: Stella Maris, 39 Eccleston Square, London, SW1V 1BX.

## **6. HOW WE KEEP YOUR PERSONAL DATA SAFE**

- 6.1 We understand the importance of the security of your personal data and take appropriate steps to safeguard it.
- 6.2 We implement adequate technical and organisational measures to ensure a level of security appropriate to the risks of our processing of your personal data. We require all those with access to personal data within the Charity to comply with organisational and technical measures that we have put in place to protect any personal data that we need to use. Where your personal data is stored electronically, it is held on a password protected database to which employee access is restricted to key individuals on a 'need to know basis'. Paper files are stored in locked cabinets to which employee access is restricted to key individuals on a 'need to know basis'.
- 6.3 We always ensure that authorised persons who have access to your information, which means only our staff, volunteers and contractors, are appropriately trained to ensure security and integrity of your personal data and are subject to confidentiality undertaking.
- 6.4 While no data transmission over the internet can be guaranteed to be 100% secure, we strive to safeguard your personal data and mitigate any inherent risk as far as possible.

## **7. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

- 7.1 The following categories of recipients may have access to your personal data:
- 7.1.1 Third parties who provide services for us, for example, the mailing house that prints our supporter appeals, our payroll provider and our HR and pensions advisers. We select our third-party service providers with care. We provide these third parties with only that data that is strictly necessary to provide the service and we have appropriate agreements in place that require them to comply with data protection laws and protect your personal data with the same care as we do.
- 7.1.2 Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event.
- 7.1.3 Analytics and search engine providers that help us to improve our website and its use.
- 7.1.4 Third parties in connection with or because of restructuring or reorganisation of our operations, for example if we merge with another charity. In such an event we will ensure your personal data and privacy rights will be protected by the third party.
- 7.2 Owing to matters such as financial or technical considerations, we may need to transfer your personal data to countries outside the European Economic Area (EEA) which are not subject to the same data protection regulations as apply in the UK. We may do this where data is stored on servers outside the EEA or where we use suppliers based outside the EEA. We meet our obligations under GDPR by ensuring that personal data has equivalent protection as if it were being held within the EEA. We do this by ensuring that there are appropriate safeguards in place with any third parties processing your data outside the EEA. This will usually be

because the country either benefits from an adequacy determination for the UK GDPR purposes and/or we have entered into a Data Processing Agreement with the third party which contains EU standard contractual clauses recognised as a valid data transfer mechanism in the UK.

- 7.3 We may also disclose your personal data or may use external data if we are required to do so under any legal obligation where we otherwise have a lawful basis to do so (for example for the purposes of fraud prevention and credit risk reduction).

## **8. KEEPING YOUR INFORMATION UP TO DATE**

We take care to ensure that your personal data we hold is up to date and we would really appreciate it if could you let us know when your contact details change.

You can do so by contacting us at:

Post: Stella Maris, 39 Eccleston Square, London, SW1V 1BX

Email: [info@stellamarismail.org](mailto:info@stellamarismail.org)

## **9. CHILDREN'S INFORMATION**

Our services are aimed at individuals of working age and we do not proactively seek out children's data but we appreciate that our supporters are of all ages. Whenever we collect personal data of children (under the age of 16 years), we will ask for consent from a parent or guardian.

## **10. HOW LONG WE KEEP YOUR PERSONAL DATA FOR**

- 10.1 We will hold your personal data for as long as it is necessary for the relevant processing purpose. By way of example, we hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes. Please see our Retention Policy.
- 10.2 Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. We will periodically ask you to renew your consent.
- 10.3 If you ask us to stop contacting you with marketing or fundraising materials, we will stop using your personal data for that purpose but will keep your contact details on our internal marketing suppression list, needed to ensure we comply with your request.



## **11. YOUR RIGHTS**

11.1 You have the right to obtain confirmation whether we process your personal data, and, where that is the case, access your personal data and request details of the processing activities that we carry out involving your personal data through making a Data Subject Access Request. To make a request contact us:

Post: Stella Maris, 39 Eccleston Square, London, SW1V 1BX

Email: [info@stellamarismail.org](mailto:info@stellamarismail.org)

11.2 You also have the following rights to:

11.2.1 request rectification of personal data that is inaccurate or out of date

11.2.2 erasure of your personal data (known as the “right to be forgotten”)

11.2.3 restrict our processing of your personal data

11.2.4 request, in certain circumstances, that your personal data be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”).

11.3 All of these rights are subject to certain exemptions and restrictions set out in data protection law. To exercise any of these rights, you should contact the Chief Executive Officer at the above address.

11.4 If you are not happy with the way in which we have processed your personal data or dealt with your request, you can complain to the Information Commissioner’s Office (ICO). Further details about how to complain can be found at <https://ico.or.uk/make-a-complaint/>

## **12. CHANGES TO THIS PRIVACY NOTICE**

12.1 This Notice may be revised and updated from time to time. We will advertise any updates on our website and if we make any significant changes, we will contact you directly with the information.

12.2 Please check this Notice when you consider giving us your personal data.

12.3 This Notice was last updated in November 2023.