

Retina UK Privacy Policy

V.1.1 November 2022

About us

Retina UK is a registered charity. It exists to support people living with progressive sight loss caused by inherited retinal dystrophies (IRDs), and funds cutting edge research to ultimately make their challenges a thing of the past.

We take the safety of your personal information very seriously and below we explain how we keep your information safe and secure. Our full contact details can be found at the end of this document.

To allow you to navigate swiftly to the section of interest to you, this policy covers eight distinct areas:

- [Membership, donors and fundraising](#)
- [Helpline and service delivery](#)
- [Events](#)
- [Volunteers](#)
- [Surveys](#)
- [Recruitment](#)
- [Website and marketing](#)
- [Shop sales](#)
- [Security, general processing and your rights](#)

Within this document we make reference to a lawful basis called 'legitimate interests'. This is simply a clause within the data protection legislation that allows us to process your personal information without your consent as long as we have a legitimate reason, and that reason is not outweighed by your fundamental rights and freedoms. You can find out more about this on the [ICO website](#).

Membership, donors and fundraising

Why we need your information

In order to support our community and continue to fund cutting-edge research, we need to process personal information.

Information captured is used to manage membership records, keep accurate financial records in relation to donations and gifts, and process personal information relating to supporters, and volunteers who generously give their time and help run fundraising and information events. Information is also captured to facilitate supporters' involvement in events and activities for which they have registered.

We will also maintain a record of any correspondence or enquiries that you make with us.

What information do we capture?

We typically capture your contact details including name, date of birth, address, email address and telephone numbers. If you offer them, your social media name may also be captured.

Where donations or payments are made, for which we are very grateful, full details of the donation is needed; this will include details of the donation including amount and source, bank or card details, if given, and any gift aid declarations that you may give.

You may share other information with us within your enquiry or correspondence, and we may capture details of any accessibility needs you may have. If you are attending an event we will ask if you have any specific food allergies or preferences. With fundraising events we usually collect name, email address, contact details and details of any proposed activities, as well as clothing size for certain events.

You may also choose to share details of your, or another individual's, eye condition, other medical diagnosis, or personal circumstances which data protection legislation classifies as sensitive.

We do not knowingly send communications to children, but we may have their details on file if a parent or care giver has sought information from us.

The legal reason for processing your information and how long we keep it

If you make a one-off or regular donation to us, we are legally obliged to keep tax records for a certain period of time, we keep our financial records for 10 years from the last interaction with you.

Where you are a member or supporter, we will rely on your consent, our own legitimate interests or legal obligation, to maintain accurate financial records to process your information. We retain your records for 10 years from last contact with us.

How we obtain your information

Typically, personal data relating to membership and fundraising will come directly from you, or your representative, and this may be via our phone lines, email, website, social media, or through one of the numerous online donation sites, such as JustGiving, or where we met you in person at an event.

With your permission, your details may also be passed to us from other not-for-profit and third party organisations.

In relation to corporate supporters and trusts, we may have your details passed to us by colleagues or third parties who believe you may have an interest in supporting us. We may also identify companies and corporate individuals whose details

are in the public domain, for example on the Internet, on social media platforms, in a newspaper or magazine.

Where your information is stored

Fundraising and marketing data is held on an online record management system held and managed within the UK.

With whom we share your information

Your donor, member and supporter details will be kept within the charity, accessed by staff and, from time to time, volunteers. We will be required on occasion to share information with the Charities Aid Foundation and HM Revenue and Customs to facilitate financial processes and Gift Aid claims. We may also need to share information with our professional advisors such as our accountants.

When assisting at or attending events we may need to share contact details with venues, organisers and other volunteers.

If you participate in an event, such as the London Marathon, your details will be shared with the event organisers and other third-party organisations who may be assisting us in the running, attendance or management of the event.

Helpline and service delivery

Why we need your information

We provide a range of services to support our community, their relatives and members of the public. These include our Helpline, Talk & Support service, Local Peer Support Groups and Discover Wellbeing.

What information do we capture?

We typically capture your contact details including name, address, email address, telephone numbers and, if relevant,

your date of birth. If you engage with us via social media, your social media name will also be captured. You may share other information with us including medical details relating to your, or another person's eye condition, other medical diagnosis, or information regarding your personal circumstances. The data protection legislation classifies this type of information, which includes details on race, religion and sexuality as special category or sensitive data.

Telephone calls to our helpline are recorded for training and monitoring purposes.

Photographs, audio recordings of your voice and video are also deemed to be personal data and therefore your personal information will be held in podcast channels such as AnchorFM, Regional and local Facebook pages, other social media and on YouTube.

We also maintain records of any enquiries you make and keep copies of correspondence between us.

The legal reason for processing your information and how long we keep it

Where information comes directly from you, we are processing your information with your explicit consent, or as a charity we can rely on our legitimate interests to support our members and individuals who have regular contact with us.

If we are concerned about your safety or that of another person, we may process your information to protect your or their vital interests. There may also be legal reasons when we have to share your personal information with statutory authorities.

Recorded calls will be retained for 30 days and emails to our Helpline, Discover Wellbeing, Talk and Support and Local

Groups will be kept for two years. Some recorded calls are kept for longer if they hold significant training value, however we will ensure that they contain no reference to any names, addresses or any information from which an individual can be identified. We acknowledge that there is a small chance that a caller may be identified from their voice alone if they were known to one of our team undergoing training, but as stated under our Security section below, all colleagues have signed confidentiality agreements.

Information captured via our website, or our 'contact us' form, is retained on the website for six months.

How we obtain your information

The personal information we hold would normally come directly from you, a relative, friend, or healthcare professional. Your details may also be passed to us, with your consent, from another not-for-profit organisation. If you are on social media, other users may post information about you.

Where your information is stored

With the exception of social media platforms, all of your information is stored within the UK or EEA. We use the Microsoft Office cloud to store information.

With whom we share your information

Your information will be processed within the charity in order to assist and support you, and this may include volunteers, such as with our Talk and Support service. We use a number of third-party data processors, such as our web hosting and email broadcast company to help us process your information, but at all times we remain responsible for the security of your data.

We may need to share your information with our professional advisors, such as our solicitor, or a statutory authority if there is a safeguarding concern, and may share with another not-for-profit organisations who may better support you, but only with your permission.

Events

Why we need your information

We need to collect personal information about delegates and individuals who attend both our virtual and in-person events to manage the event and support individuals with any accessibility needs.

What information do we capture?

For delegates and attendees of our events we record name and contact details, next of kin and where necessary any health, dietary requirements and accessibility needs that they may have.

We never target children but they may be attending an event and so their details may be processed.

The legal reason for processing your information and how long we keep it

Delegates and attendees' information will be processed with your consent or our legitimate interests to organise the event.

How we obtain your information

Your information will typically be collected directly from you, or a representative acting on your behalf.

Where your information is stored

Your data will be stored on our Office 365 platform and within our Email and SMS broadcast systems. Our SMS service is located within the UK and our email broadcast provider is currently located in the USA.

With whom we share your information

We will share your information with venues and event organisers, which may include our volunteers, but will only provide the minimum amount of information necessary to fulfil the intended purpose.

Volunteers

Why we need your information

Volunteers generously give their time to Retina UK to enable us to deliver our information and support services, and participate in, and run events; some will have direct contact with vulnerable individuals. We need the personal information of volunteers to manage and communicate with them and ensure that Retina UK have complied with our fiduciary duties.

We need to collect personal information about delegates and individuals who attend both our virtual and in-person events to manage the event and support individuals with any accessibility needs.

What information do we capture?

For volunteers we record name and full contact details together with social media names and also information regarding their volunteer role and how they support Retina UK. If they chose to share it with us we may also record details of their medical conditions and other personal information relevant to their role. As part of our vetting procedure, we will ask for references and

those confidential replies will be held on file, as well as the results of any criminal record checks. We will also keep on file a copy of any application form that is completed, details of their volunteering activity and any qualifications or training that has been delivered to them and any correspondence between us. Photographs and videos of events may be taken.

The legal reason for processing your information and how long we keep it

Where you choose to work with us as a volunteer we will process your information with your consent. However, when you leave, we may need to retain this information under our legitimate interests or for some other legal reason.

Safeguarding and vetting checks, if performed, will be processed under our legal obligations. We will always ask for permission before recording online events, or taking your photo for promotional purposes. You have the right to withdraw this consent at any time whereby we will immediately remove your image from any sources over which we have control. However, copies of any recordings or photographs which have been stored by search engines or other third parties may still be accessible. We will keep your information for seven years after our relationship ends.

Delegates and attendees' information will be processed with your consent or our legitimate interests to organise the event.

How we obtain your information

Your information will typically be collected directly from you, or a representative acting on your behalf.

Where your information is stored

Your data will be stored on our Office 365 platform, in our donor management software and within our Email and SMS broadcast systems. All of our systems are hosted within the UK except our email broadcast provider, which is currently located in the USA.

With whom we share your information

We will share your information with venues and event organisers, which may include volunteers, but will only provide the minimum amount of information necessary to fulfil the intended purpose.

Surveys

Why we need your information

Survey information is needed to allow us to advocate on behalf of our community, to determine the strategic direction of Retina UK, to measure progress and better understand the needs of our community. We ask for certain special category or sensitive information, such as ethnicity, to allow us to identify if particular communities face specific challenges.

What information do we capture?

Some of our surveys will be anonymous, but where we do ask for personal information, we may capture your name and contact details, details of family history, any medical or genetic conditions, mental health or other concerns, and other information which you care to share with us. On some surveys we may also ask for other sensitive information such as your ethnicity.

Our survey platform will automatically capture your IP address, approximate geographical location and date and time of survey.

The legal reason for processing your information and how long we keep it

We rely on your explicit consent to process your survey responses. We will retain survey information indefinitely, but wherever possible, we will fully or partially anonymise the survey information to protect your privacy.

How we obtain your information

Your personal information will be obtained directly from you, or a representative acting on your behalf via our online survey tool, or through an external market research company.

Where your information is stored

Information will usually be stored on an online survey platform, however, we also use Microsoft and other survey tools to obtain feedback, such as following fundraising events. These platforms are within the UK and EEA.

With whom we share your information

The information you provide to us will be used for our own internal research and advocacy purposes, and we may share partly anonymized information with academics and other not-for-profit organisations, but we can assure you that where we publish our findings you will not be able to be identified in any way.

Recruitment

Why we need your information

We need to capture your information to manage applications for employment or volunteering. We need to ensure that you are qualified for the position, and we have a duty of care to protect

you, our community and other employees and volunteers who work with us.

Your information will help us understand if you have any accessibility requirements and enable us to respect equality, diversity and inclusivity within the organisation.

What information do we capture?

The amount of information we require will depend on our relationship, your job role, and the activities which you intend to assist us with. Basic information such as your name, address, date of birth and contact details are essential, and we may also require details of employment or volunteering history, corporate and personal references, right to work in the UK, and if you are working with vulnerable individuals, it may be necessary to perform a criminal record DBS check. If a DBS search is required, further details will be made available to you. We fully respect the Rehabilitation of Offenders Act.

We may ask for limited sensitive information such as information relating to your health, sexuality, religion and ethnicity but this will be wholly voluntary and only requested after a position has been offered.

How we obtain your information

Most of your personal information will be obtained directly from you, or if you apply for employment via a recruitment agency through that third party. Some information will come from third-party references, and other agencies such as the criminal records bureau.

The legal reason for processing your information and how long we keep it

If you are offered employment, all data processing related to your employment, such as training and personnel records, pay, sickness and disciplinary matters will be processed under legal obligations. Where we monitor the building for security, or our computer networks to ensure no malicious activity is taking place we do so under our legitimate interests to protect the charity and other users. In all other cases where we ask you for information, such as to take your photograph and use it in service delivery, for education or promotional purposes, we would rely on your explicit consent.

For candidates who apply for a position and who are unsuccessful we shall delete their application after six months, and for employees and volunteers, we retain their information for seven years after our relationship ends.

Where your information is stored

All personal and sensitive information is stored on a secure server and is kept to a minimum in order to reduce the risk of disclosure and unauthorised access. Only master copies are retained and access to files is responsibly managed and regularly reviewed by approved HR personnel.

With whom we share your information

Your information will be held confidentially by our Human Resources Department. It may be necessary from time to time to share your information with a manager or volunteer, but you will be made aware should this be necessary.

We have access to external legal and professional advisors and from time-to-time employee and volunteer information may

need to be shared with those parties. We also share your information with any statutory bodies such as a court, local authority or police service if we were legally obliged to do so.

For information on how we process employee data please see our internal employee privacy notice.

Website and Marketing

Why we need your information

We need your information to stay in touch with our existing members and supporters, and identify and communicate our message to new supporters. We use information gathered when you visit our website to understand how the site is being used to make it more accessible.

What information do we capture?

We typically capture your contact details including name, address, email address and telephone numbers. If you are attending an event we will capture relevant details about that as well.

Where you have asked us to add you to our [newsletter](#) we will capture your name and email address together with your IP address, your approximate geographical location, such as town or country, and details of any consent you have given. We will also ask how you would like to receive the information.

Our website uses cookies, which are small text files which are transferred to your device to allow our website to operate. Cookies contain anonymous or partly anonymous information which cannot directly identify you. Please see our full cookie policy for full details.

The legal reason for processing your information and how long we keep it

Where you are a supporter, we will rely on your consent or our own legitimate interests to process your information. We will only ever send you marketing emails or SMS if you have given your express permission. We will hold your marketing information and send postal communications, such as with our Look Forward newsletter, and telephone calls under our legitimate interests. Your information will be linked to our donor record and stored for 10 years, but you can ask for the information to be deleted sooner if there is no legal reason why we need to keep it.

Where we are trying to identify new corporate supporters we will rely on our own legitimate interests to reach out to them.

How we obtain your information

Typically, personal data relating to marketing will come directly from you, and this may be via our website, via social media, through one of the numerous online donation sites, such as JustGiving, or where you attended an event.

With corporate supporters we may have your details passed to us by third parties who believe you may have an interest in supporting us. We may also identify companies and corporate individuals whose details are in the public domain, for example on the internet, on a social media platform, in a newspaper or magazine

Cookies are only ever placed on your system if you visit our website.

Where your information is stored

Marketing data is held in our online record management system, which is hosted in the UK, our email newsletter is broadcast from a third-party platform located in the USA, and our postal items are sent on our behalf by a UK-based mailhouse company.

With whom we share your information

We never share your marketing data with any other company or not-for-profit organisation. We will only share your information with companies who support us in managing your information and staying in touch with you. For example our email broadcast and database companies. We remain responsible for your data whilst in their care.

Shop Sales

Why we need your information

We need your personal information to process your order, collect payment and arrange delivery of the awesome merchandise that you have ordered.

What information do we capture?

We just need details of your name, address and contact details together with items ordered. Credit or debit card information will be required to complete the sale, but this is not held by Retina UK. You may also wish to make a pre, or post sale enquiry and we will maintain records of any correspondence that may occur between us.

The legal reason for processing your information and how long we keep it

We are processing your personal information in order to fulfil our contractual obligations to you, and deal with any enquiries you may make following the purchase. We shall maintain a record of the order for a period of seven years.

How we obtain your information

Your information will be captured via our web order or other form when you place your order.

Where your information is stored

Details of your purchases will be stored on our website hosted in the UK and at the checkout you will be passed to our third party payment vendor Stripe, who will be responsible for the security of your financial information. You can read their privacy policy [here](#).

With whom we share your information

We process your orders internally but your payment will be processed by a payment processing company called Stripe.

Security, general processing and your rights

How we keep your information safe

We understand that your information is private, and you expect us to keep it confidential. In addition to training all of our team in how to manage your information in confidence, we also have in place technical measures to protect your information. Only those individuals who need to view your information can physically gain access to it.

We keep your information safe by applying a range of technical measures such as using antivirus, firewalls and where possible

encrypting personal information, but also ensure that all of our staff understand the importance of data protection and confidentiality and we provide training and guidance for them to follow.

We are very careful to ensure that any personal information sent via email is password protected, and where possible we keep all personal data within the UK or European Union where it can be fully protected, however, some of our data processors are located within the USA.

Backups of your information are taken regularly, and we ensure that these are all encrypted and password protected. These are stored in the UK.

Cookies

Cookies are small text files that are placed on your device by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

See our full cookie policy

Your rights

When it comes to our personal information, you have a number of rights which are enshrined in law. We have summarised these rights for you below.

- **Right of access**

you have a right to ask us for a copy of the information we hold about you;

- **Right to be informed**

before we process your personal information we have to give you the opportunity to know what we are doing with

the information, and that is the purpose of our privacy policy, which you are reading now. You also have a right to be informed if there is a serious data breach which may pose a high risk to you.

- **Right to be forgotten**

if there is no legal reason why we are holding your information you can ask us to delete it;

- **Right to object**

if you do not like how or why we are processing your personal information and it is likely to cause, or is causing you damage or distress, you can ask us to stop; this is especially true when it comes to direct marketing, for example sending you our newsletter;

- **Right to object to automated decision making**

you have a right to ask for any decisions being made about you by automated means, in other words by a computer, to be reviewed by a human being. Be assured, here at Retina UK we do not make any automated decisions about you;

- **Right to have inaccurate or incomplete data rectified**

if you believe that the information we hold on you is factually inaccurate, incomplete, or if somebody reading it would get the wrong impression, you can ask us to correct, or add your comments to it;

- **Right to claim compensation**

if because of how we have used your personal information we have caused any harm or damage as a result of a

breach of the Act, you can apply to the Courts for compensation;

- **Right to withdraw consent**

where we are processing your personal data with your consent, you have a right to withdraw it at any time.

In certain situations, the above rights may not apply, for example if you became an employee you could not ask us to erase all of your information until six years after you left the charity.

Accessibility

We are here to support our service users, and if you have any special accessibility or communication needs, just let us know and we will do everything we can to assist you.

If you are unable to communicate with us yourself, you can ask somebody to act as your representative, however we will need to take additional steps to ensure that they are acting on your behalf.

Contact details

If you have any questions or concerns about how your personal information is being used you can contact us using any of the following channels:

The Data Protection Lead
Retina UK
Wharf House
Stratford Road
Buckingham
MK18 1TD

Tel: +44 (0)1280 821334

Email: Info@RetinaUK.org.uk

Retina UK is a registered charity no. 1153851

We are registered with the information Commissioner under registration No. [Z2055543](#).

Complaints

In the unlikely event that you are unhappy with our response to your enquiry, you may contact the Information Commission using the following details:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire, SK9 5AF

Website: <https://ico.org.uk/global/contact-us/>

Helpline: 0303 123 1113 or contact them via [live chat](#).