



# Privacy Policy

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## Who we are?

Guide Dogs is a working name of The Guide Dogs for the Blind Association. Registered Office: Hillfields, Burghfield Common, Reading, Berkshire RG7 3YG. A company limited by guarantee registered in England and Wales (291646) and a charity registered in England and Wales (209617) and Scotland (SC038979)  
Tel: 0118 983 5555 Email: [guidedogs@guidedogs.org.uk](mailto:guidedogs@guidedogs.org.uk)  
Website: [www.guidedogs.org.uk](http://www.guidedogs.org.uk)

Guide Dogs also operates Dogalogue @The Guide Dogs for the Blind Association (Trading Company) Ltd (291646) its privacy policy can be found at: <https://www.dogalogue.com/pages/privacy-policy>

Our Data Protection Officer is Phillippa T. Caine.



If you have any questions regarding our Privacy Policy, please write to her at:

Guide Dogs  
Hillfields  
Burghfield Common  
Reading  
Berkshire RG7 3YG

Email: [dataprotectionofficer@guidedogs.org.uk](mailto:dataprotectionofficer@guidedogs.org.uk)

## What do we do?

At Guide Dogs we are building Extraordinary Partnerships for every person who is blind and partially sighted, achieving mobility is a journey that is personal and unique.

- **Our vision** is for a society in which people who are blind and partially sighted enjoy the same freedom of movement as everyone else
- **Our purpose** is to deliver the guide dog service and other mobility services, to break down legal and physical barriers and to enable people who are blind and partially sighted to get around on their own
- **Our values** mean that we will always seek to be trustworthy and transparent, that we will always be innovative and responsive and that we will collaborate with others whenever it is to the benefit of people who are blind and partially sighted.

## Data Protection

At Guide Dogs we are committed to both protecting & respecting your privacy and we take data protection very seriously.

As you browse our website, get in touch with us, or use our services we collect information. This allows us to understand what you are interested in, and helps us improve the way we communicate with you about our services and fundraising.



We will never exchange or sell your information to another organization for their own marketing purposes. We know that this is important to you, and want to reassure you that you are always in control of how we use your personal information with regards to marketing and fundraising activities.

However, we do need to collect and use your personal information for carefully considered and legitimate business purposes, which help Guide Dogs raise funds effectively and deliver our life-changing services.

This statement explains how Guide Dogs collect and uses your personal information, what data we collect, our legal basis for its use, and also your rights in respect of personal data.

The terms of this statement may change from time to time, so please check it regularly. Under the data protection law, we have a legal duty to protect any information we collect from you. We use appropriate technologies to safeguard your details, and keep to strict security standards to prevent unauthorized access to it.

## **Purposes**

We need to use your information to deliver our services and for the purposes below. We may not use your personal information for all of these purposes, it will depend on our relationship with you.

## **Information Requests**

We use contact information from web forms, emails, mail and telephone to send you information or materials that you have requested or to provide a service. Your contact information is also used to contact you when necessary, for example, to fulfil a query.

## **Fundraising & Marketing**

We have a range of fundraising and marketing activities to promote the aims of Guide Dogs and to raise income. We utilise a range of channels,



telefundraising, direct marketing, face to face, advertising for print, broadcast and digital arenas to achieve this. This may include talking to you about donating, competitions, lotteries, sponsorships, events, volunteering opportunities and our life-changing services. We may also ask if you are able to Gift Aid any of your donations.

## **Managing our Volunteers**

If you are one of our volunteers, we need to use your personal information to facilitate the recruitment process, to manage your volunteering activity, deliver training, involve and update you on our projects and campaigns and to ensure your safety. This may include sending you newsletters or information about our fundraising activities so you can advise the public about our work. We may also disclose to Third Parties where we have retained them to provide services that we, you or our client have requested including references, qualifications and criminal reference checking services, verification of details provided by you. More information can be found in our Volunteers Privacy Policy.

## **Service Provision**

We will require the collection of your contact details and special category data to be able to provide and administer our services, to be able to monitor the quality of these services and to answer any questions or enquiries. We may also need to use your personal information for the prevention of fraud, to identify any misuse of our services, or on an anonymised basis to monitor compliance with our equal opportunities policy.

## **Campaigning**

We campaign both locally and nationally to raise awareness about issues affecting people with visual impairments. We collect your information to keep you in touch with these campaigns.

## **Analysis, Targeting & Segmentation**

We only want to send you communications that are interesting to you to make sure we are being as efficient as we can. Therefore, we may use your contact details and information on how you have supported us to



identify your interests, along with publicly sourced data and information from data analytics companies to help us tailor and personalise our communications.

Guide Dogs uses postcode-based segmentation tools to help us understand the demographic make-up of a geographical area. This allows us to get a better understanding of the types of people who live in different areas of the country and is useful for planning purposes; to target and tailor our marketing communications and to make most efficient use of fundraising activities. to help us tailor our communications to individuals.

## Wealth Screening & Financial Profiling

Before contacting a small number of individuals, where we want to better understand their engagement with Guide Dogs and their potential interest in supporting us further, we may seek additional information including connections, business and family network information and publicly available information relating to: residential location, wealth and assets, career, donations to other organizations (including political parties where they are made public by the individual) and hobbies and interests to create a profile of their interests and preferences. This helps us understand the background of the people who may choose to support us and helps us to make requests for gifts to those who may be able and willing to give.

We use a number of different sources to aid us in our fundraising activities, including newspaper websites and archives, housing market websites and the electoral roll as well as official websites of companies, charities and other charitable organisations. In addition to general use of the internet we also make use of company, director and shareholder information from publicly available, officially registered information providers, which may include the below organizations:

Please note the table below contains 4 rows and 3 columns. Other rows may be added as required.

Source	Description	Link
NexisUK	Global News Archive	<a href="http://www.nexis.com/">www.nexis.com/</a>



192.com	UK Electoral Roll and Directory Inquiries	<a href="http://www.192.com/">http://www.192.com/</a>
Factory Phi	Prospect Research & Services	<a href="https://factory.com/">https://factory.com/</a>

## Staff & Candidate Administration

We process the personal information of our employees and candidates to enable recruitment, remuneration, pensions, benefit management, staff administration and for performance management purposes.

## Lawful Processing

Current data protection law identifies six legitimate ways to process personal data.

Guide Dogs has assessed that the following are relevant to the purposes that we are processing personal information for as listed above.

- Information is processed on the basis of the '**legitimate interests**' of Guide Dogs.
- Information is processed on the basis of **consent**
- Information is processed on the basis of a **contractual relationship**

## Legitimate Interest

The law permits personal data to be collected and used if it is necessary for a legitimate business interest of the organisation, providing it is used in a fair, transparent way and does not unduly impact the rights of the individual concerned

## Consent

Guide Dogs will ask you for your consent to send you marketing and fundraising emails, and text messages or to telephone you. You can change your consent for these channels at any time by contacting our Supporter Care Team on 0800 953 0113 or by emailing [guidedogs@guidedogs.org.uk](mailto:guidedogs@guidedogs.org.uk)



## **Contractual Relationships**

If you have signed a Volunteering Agreement or entered in to a contract for provision of services with Guide Dogs then this is a Contractual Relationship, and you should refer to your terms and conditions.

## **What are Guide Dogs Legitimate Interests?**

### **Governance**

- Reporting Criminal Acts and compliance with law enforcement agencies
- Internal and external audit for financial or regulatory compliance purposes
- Statutory reporting

### **Publicity & Income Generation**

- Direct Marketing and other forms of marketing, publicity or advertisement
- Unsolicited commercial or non-commercial messages, including fundraising campaigns, income generation or charitable fundraising
- Personalisation used to tailor and enhance the customer experience in our digital and postal communications
- Analysis, targeting and segmentation to develop corporate strategy and improve communication efficiency
- Processing for research purposes (including marketing research)

### **Operational Management**

- Employee and Volunteer recording for recruitment, safety, performance management or workforce planning purposes.
- Provision and administration of staff benefits, such as pension
- Physical security, IT and network security
- Maintenance of suppression files
- Processing for historical, scientific or statistical purposes



## **Financial Management & Control**

- Processing of financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims including debt collection via out of court procedures.

## **Administrative**

- Responding to any enquiry from our supporters
- Delivery of requested products or information packs
- Thank you communications and receipts
- Administration of existing financial transactions
- Maintaining 'Do not contact lists' (suppressions)

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will always balance your rights as an individual against our legitimate interests.

## **Data Collected**

We collect and use your personal information such as name, address details, email address, telephone numbers, date of birth, IP address and information regarding what pages you have accessed on our website. We also collect information about the services you use, any purchases or financial transactions you make, or marketing contact preferences you give. We maintain a record of communications we send you and we may log any communications that you send us.

If you have kindly Gift Aided your donation to Guide Dogs, we must record the fact you are a UK taxpayer and we must maintain a record of the amount of Gift Aid we have claimed.

## **Do we process 'special category' personal information?**

Under data protection law, certain categories of personal information are recognised as 'special category', this includes health information and ethnicity. In specific cases, we may collect special category personal



data about you; we would only do this if there is a clear reason for doing so, such as where we need this information to ensure that we are able to provide appropriate services and facilities, to answer your questions and enquiries, to enable you to participate in an event (such as a marathon). We would also use this information on an anonymised basis to monitor compliance with our equal opportunities policy.

### **Your credit or debit card information**

If you use your credit or debit card to donate to us or buy something online, we pass your card details securely to our payment processing partners and do not store the details on our website or databases.

### **Where does the information come from?**

Most of the personal data we hold is given to us directly by our supporters, clients and volunteers in the course of interacting with our services, websites, campaigning or fundraising activities. We may also receive your personal information when you donate to Guide Dogs through third party services such as Just Giving, Virgin Money Giving or BT Donate.

In some circumstances, we might update our supporters' information using other agencies for example Royal Mail postal address file. For our Direct Mail communications, we will use the Telephone or Mail Preference Services or The Fundraising Preference Service to ensure we do not contact people who do not wish to hear from us.

Guide Dogs also uses the Mosaic postcode based segmentation tool from Experian Ltd to understand demographic make-up of geographical areas of the UK. This allows us to get a better understanding of the types of people who live in different areas of the country and is useful for planning purposes; to target and tailor our marketing communications and to make most efficient use of our fundraising activities.

### **Data Retention**

In general terms, we remove identifiable personal data from our records seven years after the date of our last interaction. In most cases, this represents seven years after the last financial transaction. There are a



few exceptions to this rule, such as if a supporter has kindly left Guide Dogs' a gift in their Will we will maintain our records of that pledge indefinitely to carry out legacy administration and communicate effectively with the families of people leaving us a legacy. If you are Guide Dogs' client, we will retain your records for six years after you ceased to be a client.

## **Data Sharing**

Guide Dogs will not share or sell your personal information to any other organisation for their own marketing purposes.

## **Data Protection Rights**

Where Guide Dogs is using your personal information on the basis of your consent, you have the right to withdraw consent at any time. You also have the right to ask Guide Dogs to stop sending you direct marketing.

If you wish to change how we contact you or tell us that you do not want to receive our occasional direct mail, please contact our Supporter Care Team on Freephone 0800 953 0113 or email them at [guidedogs@guidedogs.org.uk](mailto:guidedogs@guidedogs.org.uk)

### **Right to be Informed**

You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

### **Right of Access**

You can write to the Data Protection Officer asking what information we hold on you and to request a copy of that information. We will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

### **Right of Erasure**

From May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). In many cases we would



recommend that we suppress you from future communications, rather than data deletion to ensure that we do not contact you in the future.

### **Right of Rectification**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

### **Right to Restrict Processing**

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

### **Right to Data Portability**

Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor.

### **Right to Object**

You have an absolute right to stop the processing of your personal data for direct marketing purposes

### **Right to object to automated decisions**

In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions “that have a legal effect on you”, you have the right to object. This right is more applicable to mortgage or finance situations. Guide Dogs does not undertake complex computerised decision making that produce legal effects.

### **Social Media Marketing**

We may participate in social media marketing, which enables us to display adverts to our existing supporters when they access certain social media platforms. We may provide your email address, mobile number and address to a given social media platform so they can determine whether you are a registered account holder with them. Our adverts may then appear when you access their platform. Your data is sent in an encrypted format that is deleted by the social media provider if



your email does not match their records. Any social media provider that we work with will be under a contract with us and they will have to undertake not to use your information for any other purpose.

## **Collection of Data through ‘Cookies’ on the Guide Dogs Website**

Guide dogs employ a number of cookies across our website in order to enhance the user experience, and ensure that we are able to provide the relevant content that our visitors might expect.

To do this we use a combination of session, persistent and third-party cookies.

### **Session Cookies**

Session cookies allow our users to link their actions during browser sessions, they expire after a session and are not stored long term. We use this type of cookie to maintain a user session on the website, we also use session cookies to collect data on how visitors use our website, for example what type of browser they are using and what pages are popular.

### **Persistent cookies**

Persistent cookies are stored on the user’s device in between browser sessions which allows preferences or actions of the user across a site to be remembered. We use persistent cookies to make our website more accessible to users. These cookies help us to provide the user with the text size and colour options they require.

### **Third party cookies**

Third party cookies are set by a domain other than the one visited by the user. We use these cookies for our work with third party organizations, to allow us to understand the journey that our visitors take to get to our website.



## **Marketing (targeting or advertising) cookies**

These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They remember websites you have visited and that information is shared with other parties such as advertisers. For example, we use third party companies such as Google's DoubleClick to provide you with more personalised adverts when visiting other websites.

You can change your settings on your browser to prevent cookies from being stored on your computer or mobile device without explicit consent. Your browser 'help' section will normally provide details on how to manage the cookie settings.

To opt-out of Google's DoubleClick use of cookies please visit <https://www.google.com/settings/ads/onweb#displayoptout> or for any other marketing cookies <http://www.networkadvertising.org/choices/> If you have any further questions about cookies then please contact [website@guidedogs.org.uk](mailto:website@guidedogs.org.uk).

## **What happens when you link to another site?**

Our websites contain links to other websites. This privacy policy applies only to our sites, so you should always be aware when you are moving to another site and read the privacy statement of any site which collects personal information.

We do not pass on any personal information about you to any other site when you link to another non- Guide Dogs' site.

## **Information Security**

We use cloud based systems to process our data and, as such, this data may be processed outside of the EEA. We adopt the Information Commissioners approved measures when we process outside of the EEA which means that all processing conducted in a location outside of the EEA is carried out in accordance with European Data Protection regulations. If you require further information, please contact our Data Protection Officer at [dataprotectionofficer@guidedogs.org.uk](mailto:dataprotectionofficer@guidedogs.org.uk)



By submitting your personal data, you agree to this transfer, storing or processing. We will take all the steps necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you give to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Notification of changes to this privacy policy**

This privacy policy may change from time to time, for example to reflect new legal requirements. If it changes we will place an updated version on this page. Please review this page regularly to keep up-to-date with any changes to the Privacy Policy.

## **What to do if you are not happy with this Privacy Policy?**

In the first instance, please talk to us directly so we can help resolve any problem or query. Our friendly supporter services team can help on 0800 953 0113 or [guidedogs@guidedogs.org.uk](mailto:guidedogs@guidedogs.org.uk) or you can contact our data protection officer using this email address [dataprotectionofficer@guidedogs.org.uk](mailto:dataprotectionofficer@guidedogs.org.uk)

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at <http://www.fundraisingpreference.org.uk/> by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.



You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line **0303 123 1113** or at <http://www.ico.org.uk>

Page last updated: 1<sup>st</sup> May 2018

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