

Privacy Policy

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Contents

1.	Introduction and Purpose	3
2.	What we do not do	3
3.	How we use your information	3
4.	Data received or shared with third-parties.....	13
5.	How we store your personal data and keep it safe.....	13
6.	Your Rights	14
7.	Changes to our Privacy Policy	15
8.	Contact us	15

Privacy Policy

1. Introduction and Purpose

At the Royal Osteoporosis Society we are committed to protecting and respecting your privacy and keeping your data safe. This Privacy Policy (together with our terms of use and any other documents referred to in it) sets out how the charity collects and uses your data, and your rights to have your personal data protected.

Gaining a better understanding of our supporters and beneficiaries through collecting, storing and processing personal data allows us to make more informed decisions about the support and services we provide and the fundraising we conduct. It helps us to make more efficient use of our resources and ultimately, to bring us closer to beating osteoporosis.

You can read our Supporter Charter which outlines our commitment to ethical fundraising practice. We are also registered with the Fundraising Regulator, commit to the Fundraising Promise, and comply with requirements of the Fundraising Preference Service.

The data controller is the Royal Osteoporosis Society, a charity registered under number 1102712 in England and Wales and in Scotland under number SC039755; a company limited by guarantee registered under number 04995013 in England and Wales with registered offices at St James House, Bath, BA2 3BH.

2. What we do not do

The Royal Osteoporosis Society does not sell, trade or rent your personal information to others, for marketing purposes or otherwise. Please see our Supporter Charter for more information.

We do not conduct telemarketing, but you may receive calls from us for administrative purposes, for example to check the accuracy of our records and update your details, or in connection with your donation or membership.

3. How we use your information

This section outlines how we use your information based on your interactions with the Charity. We have also outlined the **legal basis** we rely on under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to process your information.

a. If you are a member or health professional member

We use the information you have given to us as part of your Membership Registration to provide you with the membership

benefits that you are paying for. We process your personal data to fulfil this contractual obligation.

Some examples of how we use your personal data:

- Using your name and address to post you a copy of Osteoporosis News magazine
- Using your bank details to process the payment for your membership
- Providing you with information about changes to our services and to inform you about other similar services we offer as part of your membership
- Using your date of birth to send you a birthday card
- Sending you Osteoporosis Review if you are a health professional member.

We rely on your proactive **consent** to send you further information about the Charity, including fundraising appeals, etc. When you sign up as a member, we give you the option to **opt-in** to these further communications. You will only receive these additional communications if you opt-in and you can opt-out at any time.

Alternatively, if you fall into another category outlined in this policy, we may process your personal data for other purposes.

b. If you are a volunteer

This includes trustees, ambassadors, lead volunteer advocates (LVAs), volunteers on committees and teams, and all other types of volunteers for the Charity. ~~and friends of the Charity.~~

We use the information you have provided as part of your Volunteer Application Form to:

- process your references, where applicable,
- contact you about your volunteer role,
- send you Volunteer Network News and other updated relevant documents and communications relating to your role by email or post whilst you are a volunteer,
- we will hold your contact details and the details of your volunteer role for six years after your last day in order to keep a record of your volunteer experience with us, and to resolve any complaints
- we give you the opportunity to opt-in to other communications which may be of interest to you as a volunteer and we will only send these to you if you give your pro-active **consent**.

We rely on **legitimate interest** to process your data for the purposes of acting as a volunteer. However, for trustees we also have a legal obligation to collect certain types of information.

c. If you are a healthcare professional or corporate partner

We use the contact details you give us when you sign up to attend events (including digital live events and on demand recordings) contact us concerning the training (including eLearning and live or on-demand networking events) we offer, enrol onto our courses, other partnership opportunities, to provide you with information about future training, events, professional development and partnership opportunities which we believe may be of interest to you.

We will always rely on a lawful basis to process your data and communicate with you, and you can opt-out at any time. The lawful basis that we can rely will on, will depend on why we are processing your information, these include:

Consent (If you've given your pro-active consent to the processing of your personal information for one or more specific purposes. Taking an action to agree you're happy with us to process your information could include clicking a button or replying to an email. We might use this basis to contact you via email to market our services or to fundraise)

Legitimate interests (If we process your personal information for this reason, we believe we have a legitimate reason and that this reason is not overridden by your interests, rights, and freedoms. If we rely on our legitimate interest, you have the right to object)

You can unsubscribe and opt-out from receiving these communications at any time.

As a healthcare professional you may also make a donation or volunteer for the Charity, please see the other categories for further information about how your information will be processed.

Your payment details will be used only to process your payment for events or training.

d. If you have given a donation to the Charity

We will use the payment details you have provided to process the donation. If you have consented to Gift Aid, we will also record and process this information for the purpose of claiming Gift Aid.

We may combine information you provide to us with information available from public and external sources to gain a better understanding of our supporters to improve our fundraising methods, products, and services.

We will always rely on a lawful basis to process your data and communicate with you, and you can opt-out at any time. The lawful basis that we can rely on, will depend on why we are processing your information, these include:

Consent (If you've given your pro-active consent to the processing of your personal information for one or more specific purposes. Taking an action to agree you're happy for us to process your information could include clicking a button or replying to an email. We might use this basis to contact you via email to market our services or to fundraise)

Legitimate interests (If we process your personal information for this reason, we believe we have a legitimate reason and that this reason is not overridden by your interests, rights and freedoms. If we rely on our legitimate interest, you have the right to object)

Profiling

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We may also carry out profiling to fast track the research using trusted third-party partners. You will always have the right to opt-out of this processing. We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. This may include people connected to our current major supporters, trustees or other lead volunteers.

We also use publicly available sources to carry out due diligence on donors and to meet money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way and make sure that we provide you with an experience, as a donor or potential donor, which is appropriate for you.

Please note that we will not contact you if you have previously opted out of receiving communications from the Charity.

e. If you have signed up to participate in a fundraising or information event

We will use the information you have provided to communicate with you about the event you are participating in, and also about future

events that you may be interested in. We rely on your **legitimate interest** to do this.

In addition, we may receive your contact details from a third party with whom you have registered for the purpose of raising money for the Charity or taking part in an information event. In this case we will use the registration details provided by the event organiser to send you information about the event and about your fundraising activities. For example, if you choose to raise money for us through an online fundraising portal such as JustGiving and give consent for them to share your information with us, we will receive your data in line with their privacy policy and use it to keep in touch with you about your fundraising.

f. If you are or have been an employee of the Charity or are applying to work with us

- i. See separate Employee Privacy Notice
- ii. If you are applying for a job at the Charity you will find our Applicant Privacy Notice available here.

g. If you call our Helpline

We may record your call, unless you request that we do not, this is in line with our Call Recording Policy. We rely on our **legitimate interest** to record your call as we are able to enhance the service we provide by listening back to calls, and better identify safeguarding issues in line with our Safeguarding and Protecting People from Harm Policy. All calls are deleted from our system after six months and are only accessible to limited charity employees for training and quality purposes.

As part of your call, we may invite you to **opt-in** to further communications from the Charity that may be of benefit to you in helping you take care of your bone health, and to find out more about other charity activities. We rely on your pro-active **consent** to send you these communications and if we do not have it, we will not contact you.

We may also ask you for information related to your age bracket, gender, first part of your postcode and ethnicity, to gain a greater understanding of those accessing our support services. This information is stored separately to any other information we may hold about you and is used purely to provide statistical reporting and enhance the service on offer.

If you request an information booklet as part of the call, we will rely on **legitimate interest** to send you an invitation to become a member of the Charity. There is no obligation to sign up and this is

the only additional information we will send to you unless you have given us your pro-active consent to send further charity communications.

You should be aware that there are certain circumstances where we cannot guarantee confidentiality, for example, where we believe someone's life to be at risk. Please see our Safeguarding Policy for further information.

h. If you use live chat

We rely on your pro-active **consent** to store any information about you collected through live chat. When you select live chat on the website, you will be asked for your consent for us to use your data within the Charity as described below:

We will invite you to answer a couple of questions before commencing the live chat conversation. This is to help tailor the information we give you. This information is stored separately and is used purely to provide statistical reporting and enhance the service on offer.

You will be asked if you would like a copy of the conversation sent to you by email. We won't use your email address to contact you about anything else, unless you've previously given us your permission to do so.

After you have concluded your chat you will be asked if you would like to take part in a short evaluation survey. As part of this you will also be invited to participate in a follow up survey after six months, for which you will need to provide your email address. We won't use your email address to contact you about anything else, unless you've previously given us your permission to do so.

We will keep a transcript of your live chat conversation for training and monitoring purposes. The transcripts will be deleted from our system after 12 months.

As part of your live chat conversation we will invite you to **opt-in** to further communications from the Charity that may be of benefit to you in helping you take care of your bone health, and to find out more about other charity activities. We rely on your **consent** to send you these communications and if we do not have it we will not contact you.

i. If you are a corporate partner or prospective partner

We will contact you using information that is publicly available on your website, or information that you have provided to a charity

representative to contact you about potential ways in which we can work together.

We also rely on **legitimate interest** to send those identified as corporate partners news and updates. These will only be sent to those who have registered interest in working with the Charity and have an interest in receiving these updates. They provide you with information about the work of the Charity and potential partnership opportunities. You can unsubscribe and opt-out from receiving these communications at any time using the link in the email.

j. If you attend a support group

We will only contact you about local support group activities when you have given us your pro-active **consent** to do so.

We will only use your information for other purposes if you have given your pro-active **consent**, or you fall into other criteria as outlined in this policy.

You can **opt-out** of local support group activity and events information at any time and your information will be retained in line with our Data Protection Policy.

k. If you use our website

If we collect personal data from you through our website, we will use it for the purposes for which you have provided it. More information on this can be found in the relevant sections above. For example, if you have used our website to complete the osteoporosis risk checker, the osteoporosis risk checker section below will explain what information we have collected, and how we use it.

All personal data that you provide to us using forms on our website will be stored securely in line with our Data Protection Policy and will only be used in accordance with this policy. Further information is provided at the point at which you provide us with this information.

We may also invite you to participate in an evaluation, or to give us feedback on the website. Information gathered through these surveys is used anonymously to help us understand more about who we are reaching, and how our service is performing. We will only use your information for other purposes if you then give your pro-active consent as part of the evaluation.

Our website also uses cookies, which are small bits of data downloaded on to your device, to enable our website to function properly and to distinguish you from other users of our website.

The cookies we use also help us to improve our site, to make the information provided more relevant to you and to provide you with a good experience when you browse our website.

There is a notification for all website users that gives you the opportunity to **consent** to non-essential cookies being used. More details about the non-essential cookies that we use can be found in our cookie policy, which is available at theros.org.uk/cookies-policy/.

When you visit our website, the following information may be collected automatically:

- Technical information, including the IP address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and the type of device you are using;
- Information about your visit, including the route into and through our site, length of visit and pages you viewed.

We will use this information:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for the device you are using;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to help keep our site safe and secure;
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them;
- to gain a better understanding of our supporters and beneficiaries to enable us to improve our services or the effectiveness of our fundraising.

When we set strictly necessary cookies, and they use information about you, we rely on **legitimate interests** as our legal basis to use this information, because the functionality of the website is a legitimate interest of ours.

Strictly necessary cookies use information for the purposes in bold above.

When we set other cookies (for the purposes not in bold above), we rely on **consent**, which you can withdraw at any time by updating your browser settings. When you next visit our website, you will be presented with the option to consent to cookies if you want to change your mind.

Where possible, we anonymise the information that we collect through cookies, to ensure that an individual is not identifiable from the data we have collected. For example, we may collect information about the number of visits to a particular page, but not link that to the individual who has accessed the page.

Where you have consented to targeting cookies, Google will set a cookie that tracks your progress through the website. This is used by Google to link to other information that Google holds about you to build a profile of your browsing history. We might then ask Google to show adverts for the Charity to users who they know to have a similar profile to yours, to reach individuals who might be interested in visiting our website. Google may also use this information to select relevant adverts for you, based on individuals with similar profiles. If you have signed into your Google account (and have accepted all relevant cookies), Google may build a profile linked to your account, and your visit to our website will be part of that profile.

More information about how Google uses your personal data can be found at policies.google.com

We also work with Meta to increase our website engagement. Meta will set a cookie similar to the one described above which will build a profile based on your IP address and your browsing history.

We also send Meta information about your email address if you have provided us with one and have consented to this by accepting third party cookies. The information that we provide is "hashed". This means that your email address is turned into a randomised code. Meta can then compare this with the information that they hold and match the email address to your account. This enables Meta to link your association with us to the profile that they hold, and they will use this information when providing targeted adverts to individuals. This can only be carried out where you have agreed to the placing of cookies from both us and Meta, and if you do not have an account with Meta, no personal data will be provided to them. The randomised code applied to a non-Meta user's email will not match with the Meta database and then be deleted by them.

More information on how Meta uses your personal data can be found at facebook.com/privacy/policy

Where the cookies we have described above use any identifiable information about you, such as your email address or your IP

address, we rely on consent as our lawful basis for this. You can withdraw your consent at any time, as set out above.

I. If you use our osteoporosis risk checker

If you participate in the osteoporosis risk checker on the website, we will use the information that you have supplied to provide you with an indication of your level of risk of developing osteoporosis, and actions you can take to look after your bone health.

If you provide us with your email address during this process, we will send those results to your email, along with follow up information about keeping your bones healthy, and information relevant to your risk result such as recommended actions. You can unsubscribe and opt-out of receiving these communications at any time. We rely on **consent** as our lawful basis for this, and by inputting your email address, you have consented to receive the results, and follow up emails.

We will collect your location information using the IP address of the device that you access our osteoporosis risk checker from.

We may also use anonymised or pseudonymised data (including location data gathered from your IP address) to further our charitable purposes by, for example, producing statistics based on the responses provided. When we do this, we will ensure that you will not be identifiable from the information that we use. We may share this information with our sponsors on an anonymised basis.

m. Other

There may be other circumstances where we process your personal data, here are some examples:

- If you offer to share your story with the Charity we may collect information in addition to your contact details, in relation to your experience of living with the condition. This may include health information. We require your pro-active **consent** to hold and process this type of information. We will give you the choice to decide with whom your story is shared, and provide you with further details when you submit your information to us.
- We may keep records of our correspondence with you and may ask for feedback to ensure we provide you with a high-quality service.
- Where you have provided your **consent** to receive specific categories of communication, we will keep you informed about our work and how your support is making a difference.

- If you submit an application for a research grant, we will process your application which includes sharing your application with the Research Grants Committee.
- If you participate in a research project or consultation group led by the Charity, in this case you will have given your proactive **consent** to participate and/or applied to be part of a volunteer panel. Your personal information will be used for the purpose of inviting you to consultation events and for the purposes of the project. You may also be offered the opportunity to give your consent (opt in) to receive wider charity communications which may be of interest to you.
- We may also use the information you provide us with to help detect fraud.

4. Data received or shared with third-parties

Your information may be shared with us if you have provided your pro-active **consent** or have submitted information to a third-party supplier in order that we can provide the service that you have requested. For example, a fundraising platform or company that arranges challenge events to raise charity funds.

We do not purchase any data from third party suppliers but data from other organisations may be passed to us if you have given them **consent** to have your information shared with us or where they are acting on our behalf to provide a service for you.

We work closely with our third-party suppliers to ensure that they operate in accordance with the Data Protection Act 2018, the GDPR, and this Privacy Policy. Further information can be found in our Data Protection Policy.

When you submit your information to a third party, it is important to check their Privacy Policy for details of how they use your data before submitting your personal information.

5. How we store your personal data and keep it safe

Any information you provide to us is stored in a way that makes us compliant with all legal requirements and industry best practice.

We make use of services of third-party suppliers and your data may be stored on one or more of these services. We only select and use third-party suppliers where they meet our governance requirements and hold well recognised certifications which independently validate their processes, people and technology.

Any data collected will be mainly stored on services based in the UK or the European Economic Area (EEA). However due to the nature of public-cloud services, your data could be processed outside of these zones. In this case we will make sure that we follow guidance from the National Cyber Security Centre (NCSC) as well as the relevant lawful safe-harbour agreements.

Where any payment information is taken and processed using third parties, we will ensure that these suppliers meet current legislation and industry guidance. In the case of recurring payments, your payment information will be held securely by the processing system for the purpose of these payments only.

We will ensure that your data is always transmitted and stored in a safe manner by using current and well-known encryption methods. We will always do our best to protect your data once it is received by us, using the approaches and methods described above. However, we cannot absolutely guarantee the security of your data. Any transmission of your personal data is at your own risk.

Our Data Protection Policy outlines how we protect your information, how long we keep it, and some further detail around making a subject access request.

6. Your Rights

The GDPR provides you with the following rights:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure, unless your data is being processed in line with a legal requirement
5. The right to restrict processing, except for processing related to a legal requirement
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Wherever we are collecting information about you, we will explain to you why we are collecting that information and what we will do with it.

If you have any questions about how we handle your information or want to find out more about your rights as outlined above, please do not hesitate to contact us.

You can also contact the Information Commissioner's Office if you want to:

- Find out more about your rights,
- Make a complaint or raise a concern about the processing of your personal data

Contact details can be found here: <https://ico.org.uk/concerns>

7. Changes to our Privacy Policy

Any future changes we make to our Privacy Policy will be posted on our website and, where appropriate, notified to you by email or post. Please check back frequently to see any updates or changes to our Privacy Policy.

8. Contact us

Please contact us if you wish to amend your communication preferences, update your contact information or to see what information we hold about you.

Membership & Supporter Team
Royal Osteoporosis Society
FREEPOST RTJH-ERRL-ZEBK
St James House
The Square
Lower Bristol Road
Bath
BA2 3BH

or email us: supporters@theros.org.uk
or call us: 01761 473287

Any questions, comments or requests regarding this Privacy Policy are welcomed and should be addressed to:

Data Protection Officer,
Helen Kingman
People, Governance and Culture Adviser
Royal Osteoporosis Society
St James House
The Square
Lower Bristol Road
Bath
BA2 3BH

or email: dataprotection@theros.org.uk

Appendix A: Glossary

Personal data: information which identifies a living individual, is biographical or which has the individual as its focus and which affects the privacy of that individual, either in a personal or professional capacity. Any expression of opinion about the individual or any indication of the intentions of any person in respect of the individual will be personal data.

Provided the information in question can be linked to an identifiable individual, the following are likely to be examples of personal data:

- an individual's salary or other financial information
- information about an individual's family life or personal circumstances,
- employment or personal circumstances, any opinion about an individual's state of mind

The following are examples of information, which will not normally be personal data:

- mere reference to a person's name, where the name is not associated with any other personal information
- incidental reference in the minutes of a business meeting of an individual's attendance at that meeting in an official capacity
- where an individual's names appears on a document or email indicating only that it has been sent or copied to that particular individual
- the content of that document or email does not amount to personal data about the individual unless there is other information about the individual in it.

Legal Basis: in order to process personal data we must have a valid lawful basis to do so. There are six lawful basis which can be relied upon to process your personal data, and we must clearly identify which basis we are relying on.

Contractual Basis: this is a legal basis we can rely on when processing your personal data in the context of us fulfilling our contractual obligations, or for us to provide you with information before we enter into a contract.

Consent: means we can only use your information for a specific purpose if you have given us your explicit consent. We may ask for your consent verbally, or in writing, in paper form or electronically.

We will ask you for your consent before we send you information about fundraising appeals and other similar communications. This is to make sure you only receive the information you want.

Opt-in: we will invite you to opt-in to some specific charity communications, this means you need to tick a box or give us your verbal consent to proceed. We will keep a record of this in order that we are sure that we have your consent.

Opt-out: this refers to your opportunity to unsubscribe from charity mailings. An exception would be when we are processing your personal data to fulfil a request, for example, the processing of a donation.

You can opt-out by following the instructions given to you, or you can ring our Membership Team on 01761 473287 or use the unsubscribe link on your email.

Legitimate Interest: this is one of the six lawful bases that we can rely upon to process your personal data. When we rely on your legitimate interest we have documented our approach, considered your privacy rights and concluded that we can communicate with you according to your previous engagement with the Charity, or your business or professional interests.

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