st michael's hospice

Donors and Supporters Privacy Notice

This privacy notice applies to individuals who support St Michael's Hospice as donors, supporters, or fundraisers, including people who donate goods. It explains how we use your personal information and your rights in relation to that information.

Who are we?

St Michael's Hospice Hastings & Rother is a registered charity (no. 288462), registered in England and Wales on 5 March 1991, Company Number 1776496. We act as a Data Controller for the personal information described in this notice. A Data Controller is an organisation or person that decides why and how personal information is collected and used.

The Hospice has one subsidiary company, St Michael's Hospice Lottery (Company Number 3351501), which is incorporated in the UK to generate income for charitable purposes and may also act as a Data Controller. A separate privacy notice applies to lottery players.

We provide high quality, responsive palliative care and bereavement support across Hastings and Rother and work collaboratively with others to improve end of life care for all.

What information do we collect about you?

Depending on how you support us, we may collect and process the following categories of personal information:

- **Contact and identification details**, such as your name, address, email address, telephone number, and date of birth where relevant;
- **Donation and financial information**, including records of donations, Gift Aid declarations, and payment details used for card payments, standing orders, or direct debits;
- **Communication records**, including your contact preferences, marketing permissions, and correspondence with us;
- **Fundraising and event information**, including details of events you take part in or organise, and sponsorship connected with those activities;
- **Retail and supporter activity**, including goods you donate and collections or deliveries we arrange;
- **Online activity**, where available, such as responses to campaigns or interactions with our websites, emails, and digital adverts;

- **Research and profiling information**, such as publicly available information, supporter interests and the results of analysis described below;
- **Health and emergency contact details**, where needed to support safe participation in challenge or fundraising events.

Health information is classed as special category personal data and is subject to additional protection. We only collect it where it is necessary and we have an appropriate legal condition for doing so.

If you use our website, please also see our website privacy notice: Privacy-Notice-Website-Version-3.0.pdf

How do we use your information?

We use your personal information to support our charitable activities and manage our relationship with you. This includes:

- Processing and acknowledging donations, including sending thank you communications unless you ask us not to;
- Administering Gift Aid claims and meeting financial, accounting, audit, and regulatory requirements;
- Managing fundraising activities, events, sponsorship, and supporter engagement;
- Providing services you request, such as collecting or delivering donated goods;

Communicating with you about our work, impact, appeals, events, and opportunities to support us, including through marketing communications and targeted digital advertising, where the law permits;

- Maintaining accurate records of your communication preferences and objections;
- Understanding our supporters, evaluating campaigns, and improving our fundraising activities;
- Protecting our systems, detecting fraud, and keeping appropriate records of concerns, complaints, and enquiries.

Lawful bases for processing

We rely on one or more of the following lawful bases, depending on the purpose:

- **Consent**, where you have agreed to receive communications or to a specific use of your information;
- **Legal obligation**, for example Gift Aid, tax, accounting, regulatory and safeguarding requirements;

- **Contractual necessity**, where processing is needed to provide a service or fulfil an arrangement you have requested;
- **Legitimate interests**, to manage and develop supporter relationships, administer and improve our fundraising, protect the Hospice, and deliver our charitable objectives, where our interests are not overridden by your rights and interests;
- **Vital interests**, in exceptional circumstances where information is needed to protect someone's life.

Where we rely on legitimate interests, we assess the purpose, necessity, and impact of the processing. We consider what you would reasonably expect, use information in a targeted and proportionate way, and provide appropriate safeguards. You can object to processing based on legitimate interests.

Marketing communications and the charitable purpose soft opt-in

We may contact you about our work, appeals, events, and opportunities to support us where:

- you have given us consent;
- we are permitted to contact you under the charitable purpose soft opt-in and the legal requirements for using it have been met; or
- an alternative lawful route applies, such a legitimate interest for postal campaigns or digital audience matching.

Where we use the charitable purpose soft opt-in for email or text messages, this will only be where you have supported us or expressed an interest in supporting us. This may include making a donation, donating goods, enquiring about supporting us, taking part in, or registering for a fundraising event, or asking to hear more about our work. We must have collected your contact details in that context, the communication must further our charitable purposes, and you must have been given a clear opportunity to opt out when your details were collected and in every subsequent message.

The soft opt-in does not apply to every interaction with us. For example, we will not rely on a retail purchase, shop enquiry, collection, or delivery arrangement alone as the basis for fundraising emails or texts. We will respect the choices recorded for you and will not use a new communication route unless it is lawful to do so.

You can change your preferences, withdraw consent, or opt out of, or object to, direct marketing at any time, by contacting the Supporter Care Team (details shown at end of notice). We may keep limited information on a suppression record so that we can continue to respect your wishes.

st michael's hospice

Profiling, research, and data analysis

We may analyse information about our existing supporters to understand their interests, tailor our communications, select appropriate audiences for campaigns, and improve our fundraising. This may include grouping supporters using information such as their relationship with us, donation history, interests, location, communication preferences, and responses to previous campaigns. We may also use information from publicly available sources, or trusted specialist research providers, to better understand a supporter's likely interests and their potential capacity to support the Hospice. This may include publicly available information about professional or charitable interests, company or charity roles, and previous philanthropic activity. We may combine this with information we already hold to create a supporter profile.

We carry out this activity on the basis of our legitimate interests in developing appropriate supporter relationships and raising funds effectively for our charitable purposes. We use the information in a targeted and proportionate way, and our staff use it to inform, not replace, their judgement about appropriate engagement. We do not use solely automated decisions that produce legal or similarly significant effects.

From time to time, we may conduct proportionate research to identify people who are not already known to us but may be interested in developing a relationship with, and supporting, the Hospice. Where we collect information about someone in this way, we will provide them with relevant privacy information within the period required by data protection law, unless an exemption applies.

You can ask us to stop using your information for direct marketing (your right to object), including related profiling at any time. You can also object to other profiling carried out on the basis of our legitimate interests by contacting our Supporter Care Team using the details below.

Digital advertising and audience matching

Where it is lawful, fair, and transparent to do so, we may use limited supporter contact information, such as an email address, with digital advertising platforms to help us:

- show relevant Hospice fundraising or awareness adverts to people who already have a relationship with us;
- avoid showing particular adverts to people who have opted out or where the advert would not be appropriate;
- measure and improve the effectiveness of our campaigns;

- help the platform identify a broader audience of people who may have similar characteristics or interests, without giving us the identities of those people unless they interact with us.

This process is sometimes called audience matching, customer matching, custom audiences, or similar audiences. The platform compares the limited information we provide with information held in its own user accounts.

Matched audiences may also help guide a platform's automated targeting, rather than limit who sees our adverts. This means the platform may show our adverts to people beyond the matched audience, including new people it identifies as likely to be interested in our work or to support us.

We will only use information selected for this purpose after considering supporter expectations, marketing preferences, data minimisation, platform terms, security, retention, and international transfers. We do not sell your information or allow it to be used for another organisation's unrelated marketing. You have an absolute right to object to the use of your information for direct marketing, including related profiling and audience matching. Contact the Supporter Care Team using the details below and we will stop using your information for these purposes.

Information sharing

We only share personal information where necessary and for a legitimate purpose. Recipients may include:

- HM Revenue & Customs, auditors, regulators, law enforcement bodies, or professional advisers where required or appropriate;
- payment, Gift Aid, mailing, event, research, data quality, fundraising, website, and technology service providers acting for us;
- digital advertising platforms where we use audience matching as described above;
- other organisations where you ask us to share information or the law permits or requires us to do so.

Where another organisation processes information on our behalf, we put appropriate contracts and safeguards in place. Some organisations, including digital platforms, may also process information under their own legal responsibilities. Where that applies, their privacy information explains how they use information within their services.

st michael's hospice

Use of AI-assisted tools

We use approved artificial intelligence (AI) tools to support the drafting and preparation of certain documents, such as internal reports, policies, guidance materials, and communications. These tools are used to assist our workforce and are not used to make decisions about individuals.

All AI-generated content is reviewed and finalised by a member of our team to ensure clarity, accuracy and alignment with Hospice values and professional standards before it is used.

We do not use donor details in AI tools unless this has been assessed as safe and appropriate, and compliant with relevant legislation.

How do we protect your information?

We take the security of your personal information seriously. We use appropriate technical and organisational measures to protect it against unauthorised access, loss, misuse, alteration, or disclosure.

Access to personal information is restricted to authorised individuals who need it for their role. Staff, volunteers, and contractors are expected to handle information in line with our data protection, information security, and confidentiality requirements.

We use a range of digital systems, platforms and services to process and store personal information. Where these are hosted or managed by third-party providers, we carry out appropriate due diligence and put contracts and assurances in place. We review the information shared and limit it to what is necessary for the stated purpose.

Where personal information is processed outside the UK, we ensure an appropriate legal safeguard is in place, such as UK adequacy regulations, the UK International Data Transfer Agreement or an approved UK Addendum to standard contractual clauses, together with any additional measures required by our assessment.

Where information is held in paper form, we use physical security, clear procedures, and audit checks. Paper records are accessed and shared only on a need-to-know basis.

st michael's hospice

How long do we keep your information?

We retain personal information only for as long as it is needed for the purpose for which it was collected, and in accordance with our data retention policies. Retention periods vary depending on the nature of the record, legal and regulatory requirements, our relationship with you and the need to establish, exercise or defend legal claims.

When information is no longer required, we securely delete, anonymise, or destroy it. We may keep limited suppression information for as long as necessary to ensure that we continue to respect a marketing objection or opt-out.

What are your rights?

Depending on the circumstances, you have the right to:

- be informed about how we use your personal information;
- access your personal information by making a Subject Access Request;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information or restrict its use;
- object to processing based on legitimate interests;
- object at any time to direct marketing, including related profiling and audience matching;
- withdraw consent at any time where we rely on consent;
- request data portability where this right applies;
- ask for human intervention where a solely automated decision has a legal or similarly significant effect;
- raise a concern or complaint about how your information is handled.

These rights do not apply in every circumstance. We will consider each request in line with UK data protection law and explain our decision if an exemption or limitation applies.

Keeping your information and preferences up to date

Please tell us if your details or communication preferences change, or if you want us to stop using your information for direct marketing, profiling, or audience matching:

st michael's hospice

Supporter Care Team
St Michael's Hospice
25 Upper Maze Hill
St Leonards on Sea
East Sussex TN38 0LB
Email: fundraising@stmichaelshospice.com
Telephone: 01424 445177 ext. 234

Further information and complaints

If you have questions about this notice, want to exercise a data protection right, or wish to complain about how your information is used, please contact:

Data Protection Officer
St Michael's Hospice
25 Upper Maze Hill
St Leonards on Sea
East Sussex TN38 0LB
Email: DPO@stmichaelshospice.com
Telephone: 01424 457984

We encourage you to contact us first so that we can try to resolve your concern. You also have the right to complain to the Information Commissioner's Office (ICO).

Raise a concern with the ICO https://ico.org.uk/make-a-complaint/

Changes to this privacy notice

We may update this privacy notice from time to time to reflect changes in legal requirements or how we use personal information. Where a change is significant, we will take reasonable steps to bring it to your attention before the new use begins. The latest version will be available on our website.

Version 5.0
October 2026