



PRIVACY POLICY

1. INTRODUCTION AND CONTACT DETAILS

- 1.1** This website is owned by the Royal Commonwealth Society. We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2** For the purpose of the Data Protection Act 2018 (the “Act”), in respect of any personal data that you submit or that is collected from you or about you, the data controller is the Royal Commonwealth Society which is a registered charity in England and Wales with registered charity number 226748 and our registered office is at 40-41 Pall Mall, London, SW1Y 5JQ.
- 1.3** We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website. For further information please read our cookie policy.
- 1.4** Our website incorporates privacy controls, which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via the [‘My Details’](#) section of the website once you have registered for an account.
- 1.5** Terms defined in the Terms of Use shall have the same meaning when used in this Privacy Policy.
- 1.6** If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy please contact our data protection officer with the following contact information:
- Postal address: Royal Commonwealth Society, 40-41 Pall Mall, London, SW1Y 5JQ
 - Email address: info@royalcwsociety.org
 - Telephone: +44 (0)20 3727 4300
- 1.7** In this policy “we”, “us”, “our” refer to the Royal Commonwealth Society.

2. INFORMATION THAT WE COLLECT ABOUT YOU

The types of personal information that we collect about you may include:

- Your title, name, gender, nationality and date of birth;
- Your contact details (address, email, phone number and social media contact details);
- Family and spouse/partner details, relationships to other supporters;
- Your professional activities and employment details;
- Current interests and activities;

- Gift aid status and records of donations;
- Contact preferences;
- Your IP address, location, browser type and information on how you interact on our website; and
- Any other information provided by yourself at our request.

3. SOURCES OF INFORMATION COLLECTED ABOUT YOU

3.1 We may collect information about you from third parties, from the public domain or information that you provide when you use the Site, when you make a donation if you consent to receiving contact from us, if you subscribe to any of our newsletters as they may exist from time to time or if you contact us for any reason.

Information you give us

3.2 When you make a donation through the Royal Commonwealth Society website, the information you will be asked to enter will include some or all of the following:

- Your name;
- Your address;
- Your credit card or other payment details;
- Your mobile or other phone numbers;
- Your email address;
- Whether your donation includes Gift Aid.

3.3 We will also collect personal information about you that is contained in any correspondence that you send to us. For example, if you contact us, we may keep a record of that correspondence by reference to your name or address. We may also ask you for information when you report a problem with the Site or with anything contained on the Site.

Information from Third Parties

3.4 We may collect generic information about your visits to and how you use the Site. We may therefore collect information such as your IP addresses, geographical location, browser type, referral source, length of visit and number of page views. Individual users will not be identifiable from this information and we may use this information for a number of purposes including website administration, optimising the use of the Site, disclosing to third party contributors or for security purposes. In particular, we may use an analytics service provider for website traffic analysis and reporting and to track information such as which browser, screen resolution and IP address you are using to access the Site, in addition to tracking your movements around the Site. Information in the public domain.

3.5 We may obtain some information from publicly available resources such as Companies House, newspaper articles or open postings on social media.

4. HOW WE USE YOUR INFORMATION

4.1 We will mainly use your information for the following purposes:

- To ensure that content from the Site is presented in the most effective manner for you and for your computer to process your donations and to maintain accounts and records of all donations received through the Stripe and GoCardless payment systems.
- To enable us to provide you with any email updates or newsletters that you may have subscribed to from time to time.
- To provide customer service in relation to your use of the Site and your donations, to contact you, to deal with enquiries and complaints relating to the use of the Site and to notify you about changes to any services.

- To administer your donation or support your fundraising, including processing Gift Aid.
- To invite you to events.
- To notify you of competition updates.
- To send you hard copy in-house publications.
- To keep a record of your relationship with us and record the contact we have had with you.
- To ensure we know how you prefer to be contacted.
- To internally monitor usage of the Site so as to enable us to improve the Site.
- To provide third parties with statistical information about our users but this information will not be able to be used to identify any individual user.

4.2 Tools may be used to improve the effectiveness of our communications with you, including tracking whether you open the emails we send you and which links you click within a message.

4.3 We may also use personal information to carry out due diligence so that we are fundraising in accordance with the law, the Fundraising Regulator's Code of Fundraising Practice and our own internal policies and procedures.

5 LEGITIMATE INTERESTS

5.1 The law allows personal data to be collected and used by an organisation if it is necessary for the legitimate business interests of the organisation. In broad terms, our 'legitimate interests' mean our interests in being able to run the Royal Commonwealth Society as a charitable entity effectively in pursuit of our objectives, provided that what the information is used for is fair and does not unduly impact the rights of the individual concerned.

5.2 The following are some of the examples of when and why we would use this approach to our work:

- **Direct Marketing:** We may send postal marketing and fundraising requests which further the aims and objectives of the Royal Commonwealth Society and don't unduly impact the rights of the individual.
- **Profiling and analysing information:** We carry out limited profiling and research to help us understand our donors and potential donors, including gathering information from publicly available resources to give an insight into philanthropic interests and ability to support the Royal Commonwealth Society (see below for more details).

5.3 Profiling and analysing information of our supporters

- In order to tailor what type and level of support we ask you for, we may analyse personal information we collect about you including how you have engaged with us previously, demographic information, measures of affluence, philanthropic interests and networks.
- We may also use information in the public domain, for example listed Directorships or typical earnings in a given area.
- You can opt out of your data being used for profiling and wealth screening techniques by contacting the Data Protection Officer (email to: info@royalcwsociety.org).

6. DISCLOSURE OF YOUR INFORMATION

6.1 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.

6.2 We may disclose your personal data to our branches, specifically those that operate in the region or country in which you reside identified at

<https://www.royalcwsociety.org/pages/category/find-your-local-branch> insofar as reasonably necessary to deliver specific programmes and events (such as local award ceremonies for our competitions (The Queen's Commonwealth Essay Competition)).

6.3 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6.4 We may disclose your personal data to our partner organisations identified at: <https://www.royalcwsociety.org/partners> insofar as reasonably necessary to deliver events and activities to which you may be involved.

6.5 Financial transactions relating to our website and services are handled by our payment services providers Stripe and GoCardless. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at:

- Stripe: <https://stripe.com/gb/privacy>
- GoCardless: <https://gocardless.com/legal/privacy/>

6.6 In addition to the specific disclosures of personal data set out in this Section 6, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6.7 your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behavior of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

- Your data will be made available to our website provider.
- The data that may be available to them include any of the data we collect as described in this policy.
- Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.
- They will store your data for a maximum of 7 years.
- This processing does not affect your rights as detailed in this privacy policy.

7. THIRD PARTY CONTENT, SITES AND CONTRIBUTORS

7.1 The Site may contain content and links to websites and microsites that are operated by third parties. In addition, any advertisements contained on the Site may operate as links to that advertiser's websites, and advertisers and third parties may also use and place cookies on your computer.

7.2 We do not control and accept no liability or responsibility for these third party websites and microsities nor for the third party content, advertisements and cookies. This Privacy Policy does not apply to such websites, microsities, content, advertisements and cookies and any information they collect by virtue of you clicking on that link will be collected and used in accordance with the privacy policy of that third party. Please therefore consult the terms and conditions and privacy policy of those third party websites and microsities to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

7.3 If you have any queries or complaints in relation to such third party sites, content, advertisements and/or links which feature or can be accessed via the Site, please contact us (please see section 1). We will try our best to assist with your queries and complaints although please note that we may not be the data controller in respect of the data that you submitted or is collected via such third party sites therefore we may not be able to do anything.

8. SECURITY AND DATA RETENTION

8.1 We and all third parties that process personal data on our behalf employ reasonable security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for a reasonable period in order to achieve or facilitate the purposes described above or as long as the law requires or permits.

8.2 We, or our data processors on our behalf, will store all the personal information, including your login and user details (where applicable), on our secure servers.

8.3 All electronic transactions that you make via the Site and that are processed by our third party payment service provider will be encrypted using industry standard encryption technology. This technology will encrypt all of your credit card numbers so that they cannot be read as the information travels over the internet.

8.4 Notwithstanding clause 8.3 above, data transmission over the internet is inherently insecure and susceptible to unauthorised access and interception, and we cannot guarantee the security of data sent over the internet.

8.5 Notwithstanding the other provisions of this Section 8, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests or another natural person.

9. INTERNATIONAL DATA TRANSFERS

9.1. In this Section 9, we provide information about the circumstances in which your personal data may be transferred to countries outside the **United Kingdom**.

9.2. We have branches (independent organisations) in **Antigua and Barbuda**, Australia, Barbados, Belgium, Cameroon, Canada, the Cayman Islands, **China (Hong Kong)**, Cyprus, Fiji, Finland, Gibraltar, Guernsey, Ireland, Italy, Jamaica, Japan, Jersey, Kenya, Malaysia, Malta, Mauritius, New Zealand, Nigeria, Pakistan, Singapore, Sri Lanka, and Uganda. Appropriate safeguards will protect transfers to each of these countries, namely the use of a data sharing agreement between the **branches** and us, which includes clauses adopted or approved by the **Data Protection Act 2018 and UK GDPR**. Personal data will only be shared with these organisations with your consent and if the branch has signed and returned their data sharing agreement, a copy of which can be obtained from the data protection officer.

9.3. You acknowledge that personal data that you submit for publication through our website or services may be available, via the Internet, around the world. We cannot prevent the use or misuse of such personal data by others.

10. YOUR RIGHTS

10.1 You are entitled to know what personal data we hold about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us using the information provided above. You can access your personal data by visiting <https://www.royalcwsociety.org/my-details> when logged into our website.

10.2 You may request us to cease sending you any correspondence, email updates and newsletters at any time by notifying us in writing or following any “unsubscribe” instructions included in any email sent to you.

10.3 If you have received unwanted, unsolicited emails sent via this system or purporting to be sent via this system, please forward a copy of that email with your comments to info@royalcwsociety.org for review.

10.4 Please let us know if the personal information which we hold about you needs to be corrected or updated at any time.

10.5 If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner’s Office in their capacity as the statutory body which oversees data protection law: www.ico.org.uk/concerns. Or by post at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

11. CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to the Privacy Policy from time to time. Any such changes to our Privacy Policy will be posted to the Site and, where appropriate, through e-mail notification.

Approved by Council: 7 December 2020