

Privacy Notice: Donors and Supporters

Who are we?

Transform Housing & Support is committed to protecting the privacy and security of your personal information.

Any personal data we collect about you will be strictly in accordance with UK Data Protection Legislation (including the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018). As a data controller we are responsible for deciding how we hold and use personal information about you.

This privacy notice tells you what to expect when Transform Housing and Support collects and stores personal and sensitive information. It tells you about the purposes for which we will process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

In this notice, whenever you see the words 'we', 'us', 'our', or 'Transform', it refers to Transform Housing & Support.

Please find below our registration numbers:

- ICO registration number: ZA 1600063
- Registration charity number: 264133
- Company limited by guarantee registered in England: 01057984
- Registered provider of social housing: H2452.

Who the personal data relates to

This privacy notice applies to information we collect about Transform's donors and supporters.

What type of personal data is collected

Categories of personal data which we may hold are:

- Contact details – your name, postal/ email address, and telephone number (this is so we can get in touch with you regarding your gift);
- Whether you are eligible for Gift Aid;

- Records of your correspondence with us;
- Financial details that you have provided to us - for example, card details (this is so we can process your gift).
- From time to time, we may also use publicly available sources to collect additional information in relation to individuals who have donated to Transform in the past, or who have been identified as prospective donors to Transform, such as:
 - Biographical details – for example, your date of birth, gender, nationality, marital status, spouse’s name;
 - Education details – for example, institutions attended, the courses you completed and dates of study;
 - Professional details – for example, employer, occupation, and work address;
 - Philanthropic details – for example, your history of donations, of both time (for example, volunteering) and money, your areas of philanthropic interest and your publicly known philanthropy.

In addition, if you accept an invitation to, and/or attend, an event hosted by or on behalf of Transform, we will process and store the following information:

- Any preferences provided by you for a specific purpose such as access requirements or other adjustments and dietary preferences for event management purposes;
- Photographs taken at events unless you request not to be photographed;
- A record of your attendance and correspondence for the purposes of event administration;
- If you have given consent, we will let you know about future events you may be interested in.

Finally, if we are in communications with you regarding an organisational partnership with Transform, we will collect the following details for administration purposes:

- Your work email address and phone number (so we have contact details within your organisation)
- Communications history (so we have a record of conversations, emails, meetings, and telephone calls relating to the partnership)

How we will process your data

All the personal data that we hold about you is information that you have provided to Transform or information which is in the public domain. We only process data for specified purposes and if it is justified in accordance with data protection law.

In general terms, we process your personal data to improve your experience and engagement with Transform as a supporter. More specifically, we process personal data for the following purposes:

Gift Administration:

- Thanking you for any gifts that help Transform’s charitable causes;
- Internal record-keeping and administration, for example, to process your donation;
- Undertaking any necessary research for our due diligence to meet money laundering regulations in alignment to our Gift Oversight Policy;
- To validate any Gift Aid claims in order to claim Gift Aid from HMRC.

Event Management

- To ensure that events are well organised and administrated, taking in to account any necessary adjustments, for example dietary and accessibility requirements, to ensure our event is inclusive, in line with the provisions of the Equality Act 2010.
- To ensure that you are informed about the event you are attending, for example through email communications and phone calls;
- To publish photographs and videos relating to our activities and events. We will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter;
- To inform you of other events you may be interested in, providing you have given your consent.

Generating further philanthropic support for Transform charitable projects:

- If you sign up to our mailing list, we will send you publications (for example impact reports, magazines, updates and invitations to events; email newsletters about Transform and its fundraising projects) in a way which is tailored and relevant to you;
- Asking you if you would like to continue to support Transform (for example, by making a donation, contributing to surveys, volunteering);
- Reviewing publicly held information to give an indication of the financial giving capacity of individuals. This is known as wealth screening. Please note that we never use the data produced by wealth screening exercises as the sole basis for sending out communications. These exercises are a starting point for further research which we carry out about a person to identify if they may be interested in supporting Transform. We consider any previous engagement with Transform, their philanthropic interests and previous donations. This enables us to identify and contact only those individuals whose interests we believe align with our charitable fundraising mission.

Research (including market research) and analysis purposes:

- To compile anonymised reports to assess Transform's progress against fundraising targets;
- To track overall giving trends and strategically analyse information in order to inform our strategy and communications.

How we use your personal data

We consider the processing of your personal data for these purposes to be necessary:

- For the pursuit of Transform's legitimate interests in fundraising, in support of our charitable mission and maintaining a strong relationship with our supporters;
- To enable Transform to comply with its legal obligations, for example for compliance with money laundering rules and Gift Aid requirements;
- For the performance of tasks carried out in the public interest or in the exercise of our official authority.
- We will ask for your consent to use your personal data to send you electronic communications such as e-newsletters and emails. You always have the right to withdraw your consent at any time.

Sharing your story

Some people choose to tell us about their experiences to help further our work. This may include sharing sensitive information related to their personal circumstances in addition to their biographical and contact information. Others may also choose to provide stories of why they work with or support Transform.

If we have the explicit and informed consent of the individuals, or their parent or guardian where appropriate, this information may be made public by us at events, in materials promoting our work, or in documents such as our annual report.

How we share your personal data

We will never sell or share personal details to third parties for marketing purposes.

We will share your details with HMRC where we are able to process gift aid.

If we run an event in partnership with another named organisation your details may need to be shared. In such circumstances, we will be very clear what will happen to your personal data when you register for that event.

We may allow our colleagues, consultants and/or external service providers acting on our behalf to access and process your personal data for the activities we have described above (for example IT support, to process payments and an account management system).

We will only permit them to use it to deliver the relevant service and if they apply an appropriate level of security protection.

We may need to disclose your personal data upon request to regulatory and government bodies as well as law enforcement agencies or legal advisors. We may also partner with other organisations and in doing so, acquire or transfer personal data, but your personal data would continue to be used for the purposes set out above.

International data transfers

Your personal data may be transferred outside the UK. We will ensure that all international transfers comply with applicable data protection laws by implementing appropriate safeguards in compliance with Chapter V UK GDPR.

For example, when we appoint data processors, we check that suitable arrangements are in place such as Adequacy Regulations, binding corporate rules, international data transfer agreements, standard contractual clauses, or other permitted mechanism.

The restricted transfers we make include transferring personal data to the EU (Germany and Ireland), New Zealand, and the US under the UK extension of the EU:US Data Privacy Framework and/or standard contractual clauses. Further information about the safeguards related to the international transfers we make can be provided on request.

For further information, please contact us.

How long we keep your personal data

We keep personal data for as long as there is a need to keep it in connection with the purposes for which it was collected and subject to any legal obligation we are required to comply with or in order to protect or defend our legal rights.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you have any questions about our data retention policy, please contact us using the details below.

Your rights

Under UK data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.
- **Your right to object to direct marketing** - Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the **right to object** to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. To exercise any of these rights, please contact us.

Making a complaint

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or online at www.ico.org.uk/concerns.

Use of cookies

Like many websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow the website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. Navigate to our Cookie Policy page to manage your consent preferences and to understand more about how we collect and store cookies.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Changes to our privacy policy

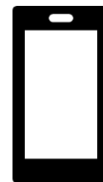
We may update this Privacy Notice from time to time by posting an amended version on our website. If at any time we decide to use your personal data in a different manner than was stated at the time it was collected, we will notify you directly via email.

Our Contact Details

If you have any questions in relation to this document or how we use your personal data they should be sent to:



Bradmere House
Brook Way
Leatherhead
Surrey
KT22 7NA



01372 387100



gdprinfo@transformhousing.org.uk



[Contact us | Transform Housing & Support](#)

Our **Head of Governance & Assurance, Mandy Arnold**, can be contacted on:
01372 387124

Data Protection Officer

We are supported in our compliance with, and management of, data protection matters by:

Data Protection People Limited
Round Foundry Media Centre
Foundry Street
Leeds LS11 5QP
Tel: 0345 340 5412

Signature: 

Date: 14 February 2025

Record of Change History

| Issue | Description of Change | Approval | Date of Issue |
|-------|-----------------------|-----------------|------------------|
| 1 | Initial Issue | Chief Executive | 14 February 2025 |

The privacy notice was last updated in February 2025 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.