

GDPR Balancing Exercise Fundraising

Activity Description	Why do we do this	What would the individual's reasonable expectations be	Do the individual's interests or rights (eg privacy rights) over-ride our interest?	On balance, can we treat this as a 'legitimate interest'?
Post collection and opening: we open the post sent to us and in doing so have access to donors contact details and often financial details via enclosed donations.	To ensure all donations are banked and to answer any queries from donors / supporters / interested parties.	Yes, People have made contact with us and expect their mail to be opened and processed. They have given us their details.	No	Yes
Donation Processing: cash	To be able to bank a cash gift and to record the gift against the donors name and address. A record of their name and address, the amount of their gift and what their gift is to be used for is made and stored.	Yes, people have freely given us this information and expect CVT to process their gifts. People would expect us to take care of their details and all information is kept <u>securely on our bespoke database system.</u>	No	Yes
Donation Processing: cheques	To be able to bank a gift made with a cheque and to keep a record against donor's details of the gifts received. We may store the donors bank sort code, so that we can match up gifts made via cheques without further correspondence to the donor record.	Yes people would expect CVT to process their gifts.	No	Yes
Donation Processing: charity vouchers (CAF etc)	To be able to process charity vouchers (such as CAF vouchers) to enable payment to be received and to keep a record against donor's details of the gifts received.	Yes people would expect CVT to process their gifts	No	Yes
Donation Processing: CAF cards	To be able to process CAF card gifts to enable payment to be received and to keep a record against donor's details of the gifts received.	Yes people would expect CVT to process their gifts	No	Yes
Donation Processing: direct debits	To be able to make a direct debit claim from the donor's bank accounts and to keep a record against donor's details of the direct debit gifts received.	Yes people would expect CVT to process their gifts	No	Yes
Donation processing: storage of bank account details	In order to be able to process regular gifts, such as direct debits, we need to store your bank account details. We do this securely and access to your details is limited.	Yes, people would expect CVT to process their gifts.	No	Yes
Donation processing: standing orders	To be able to process new standing orders and to keep a record against donor's details of the standing order gifts received.	Yes people would expect CVT to process their gifts.	No	Yes
Donation Processing: credit cards	To be able to process the credit card gift, to enable payment to be received and to keep a record against donor's details of the gifts received	Yes people would expect CVT to process their gifts	No	Yes

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Donation Processing: online gifts	To be able to process the data given online to create new donor records; to enable the payment to be received; and to keep a record against donor's details of the gifts received.	Yes, clear information is given on the web page as to how data is used and people would expect CVT to process their gifts.	No	Yes
Donation Processing: online direct debits	To be able to process the data given online to create new donor records and to enable the direct debit to be set up and consequently claimed and to keep a record against donor's details of the direct debit gifts received.	Yes, clear information is given on the web page as to how data is used and people would expect CVT to process their gifts.	No	Yes
Donation Processing: payroll giving	To be able to process the payroll giving claim, to enable payment to be received and to keep a record against donor's details of the gifts received.	Yes people would expect CVT to process their gifts	No	Yes
Donation Processing: gift aid claim	To be able to make a gift aid claim, we need to process donors' gifts, personal contact details and their eligibility for gift aid (which has been supplied to us by the donor)	Yes, people have indicated that their gift is eligible for gift aid and would expect us to process their details in such a way as to make the claim possible.	No	Yes
Direct Marketing: mailing Camphill Family Life (our newsletter and appeal) to supporters through the post.	To keep in touch with our donors and to provide them with the opportunity of supporting our latest appeal.	Yes, people mailed have made a gift to CVT and would expect to be kept updated about the charity, unless they have asked us to not keep in touch. Every mailing includes a single step opt-out procedure as well as a single step process for changing the regularity of the mailings. Donors can easily change their mailing preference.	No.	Yes
Direct Marketing: solus mailings	To tell our donors and friends about specific things relating to the charity or informing them of specific fundraising initiatives.	Yes, we only send solus mailings to those people who are on our active mailing list and are currently receiving Camphill Family Life	No: supporters expect to hear from the charity they are supporting	Yes
Photography: storage of consent forms	To keep a record of all consent forms signed by people we support, friends and donors, giving their agreement that we can take and may reproduce their photographs, within the consent given.	Yes, people would expect us to keep a record of the consent given so that we can illustrate we are using people's images in a way in which they have agreed.	No	Yes

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Recording donors contact details and gifts, following making a donation.	People who support us or request information would expect us to keep in touch. These details are freely given. We need to process their name and address details to record their gifts and to thank them for their gifts. We also need to record donation history to reconcile with bank and to enable tax reclaims on gift aid to be made. We also keep details of supporters who have requested no further mail, this is kept purely for suppression purposes and is not supplied to any third parties.	Supporters would expect us to have this information.	No	Yes
Data Cleansing: Periodically, we clean our data to ensure we have the most up to date data available to us .	We do this to avoid CVT sending information out to people who may have died or moved addresses.	Yes, people would not expect us to rely on a database which has not been updated using the most recently available data.	No	Yes
Data cleansing: supression list.	We keep a record of those people who have been on our database but who have now asked us to stop supporting them. We keep this list indefinitely in order to ensure we do not contact them in the future.	Yes, people have asked us not to contact them and expect us to follow this request. The only way we can do this is to maintain this list and process it against any mailing list we are generating.	No	Yes