



## Our privacy policy

### 1. Introduction

Moorfields Eye Charity reviews its policies periodically to ensure broad alignment with their existing and planned operational activities and regulatory responsibilities. This policy review has taken place against the backdrop of the legal and regulatory environment that we operate in and are bound by, with a focus on General Data Protection Regulation (GDPR) compliance and stakeholders' (our supporters and donors, prospective supporters, event participants, suppliers, etc.) expectations. This policy has been updated to communicate in more detail to relevant stakeholders, how we collect, store and use personal data across our fundraising and engagement, major gifts and finance and administrative activities. The policy explains in more detail than its previous version, our motivations for using personal data the way we do, the legal bases that we rely upon to process personal data, and covers not just data collected through our website but across multiple channels in our fundraising, supplier and finance activities.

To a large extent, the new version of our privacy policy has been influenced by our effort to ensure that our privacy policy captures data use in our existing and planned activities. As such, the new policy is explicit about data that is not collected directly from stakeholders and offers detail on why, where and for what purpose we collect data from third party sources, along with the legal bases we rely on to facilitate such data collection. It also details how we might use data for vetting purposes.

The policy does not cover our processing of employee, volunteer, grant holder or grant applicant data at this time. This policy will be updated to reflect these stakeholders or supplementary policies will be produced as appropriate.

### 2. Purpose

Moorfields Eye Charity is committed to protecting our supporters' and other stakeholders' privacy, keeping their data secure and not doing anything with such data that they would not reasonably expect us to. This privacy policy describes what personal information we collect and how we use it in our fundraising activities and supplier relationships. This policy applies only to our supporters, prospective supporters and suppliers.

### 3. Scope

This policy serves to communicate to these stakeholders our commitment to their privacy. This version of our policy currently concerns data relating to supporters, prospective supporters and suppliers and excludes our employees, volunteers, grant applicants or grant holders.

## **4. Who we are**

- 4.1 Moorfields Eye Charity is the main fundraising and grant making charity for Moorfields Eye Hospital and its academic partner, the UCL Institute of Ophthalmology. We provide targeted funds, above and beyond the responsibility of the NHS, to research cures and find treatments for our patients and millions of people affected by eye disease in the UK and around the world.
- 4.2 Moorfields Eye Charity is a registered charity in England and Wales (1140697) and is registered as a company in England & Wales (7543237) with the registered address 162 City Road, London, EC1V 2P.
- 4.3 References to “we” and “us” in this policy refer to Moorfields Eye Charity.
- 4.4 Moorfields Eye Charity is a data controller of the data we collect and hold.

## **5. Data protection and privacy**

- 5.1 Moorfields Eye Charity is committed to providing our supporters and stakeholders with the very best stakeholder care. We aim to ensure that we protect our stakeholders’ privacy, do not do anything which our stakeholders would not reasonably expect with their personal data, and that our stakeholders are informed about how we use their personal data.
- 5.2 Under General Data Protection Regulation (GDPR), Moorfields Eye Charity has a legal duty to protect any personal information it collects. We aim to put in place measures to protect data, and to manage any information that is shared with us securely and in line with data protection laws.
- 5.3 Please read this policy carefully, and any other documents referred to in this policy, to understand how we collect, use and store personal information.

## **6. Types of personal data we collect**

- 6.1 This privacy policy relates to various services which include, but are not limited to, providing information to our supporters on and encouraging participation in Moorfields Eye Charity’s activities.
- 6.2 The information we gather (‘information’) may include the name and address of our supporters, their credit or debit card number and expiry date, email addresses and telephone numbers and for a limited number of cases, information that can be used to identify or tell us more about our current and prospective supporters.
- 6.3 We will only collect what we consider necessary. This may include the following:
  - Name, address, e-mail address, phone number
  - Age or date of birth
  - Details of our correspondence with our stakeholders
  - Our stakeholders’ communication preferences
  - Our stakeholders’ previous communication with us

- Our stakeholders' connection to us
  - A record of the donations made to us
  - Banking details such as account number, sort code and associated information for the purpose of managing donations to us, including for processing direct debits and payments made to us
  - Credit and debit card details
  - Gift aid declarations.
- 6.4 When conducting profiling and research activities we may collect the following information. Please see section 8.7 of this privacy policy for more information on these activities:
- Employment/career highlights, achievements and biographies
  - Relevant information publicly shared on social media or other valid online sources
  - Personal Interests
  - Assessment of a donor's capacity to donate to us. Only if relevant for our fundraising activities we have a valid legal basis, this includes an estimation of wealth and any assets which are available in the public domain such as property type and value
  - Any publicly published donations to other organisations (only if relevant)
  - Records of any correspondence we have with our stakeholders
  - Family and partner/spousal details and personal and professional networks
  - Potential giving interests based on visible philanthropy

## 7. How we collect data

- 7.1 Moorfields Eye Charity captures and stores personal information about an individual who voluntarily chooses to give Moorfields Eye Charity personal information in a variety of ways including via email, post, telephone enquiries, in person and Hospital appointment kiosks, by using an electronic form on our website, by supplying data for a specific purpose (e.g. administering donations or managing our supporter, supplier and volunteer relationships), and by enquiring about Moorfields Eye Charity's services or activities.
- 7.2 We may also collect other personal data from the use of our website, such as IP addresses and access times.
- 7.3 From time to time we use targeted internet searches as part of our major gift fundraising or procurement activities and may search various online sources such as the following websites, either through search engines or directly in order to ensure the accuracy of the information we hold and for the purposes listed in section 8.7 of this privacy policy:

### *Public sources for companies*

- Companies House and other business-related resources (free and subscription-based) for UK companies including credit reference agencies where appropriate
- Securities and Exchange Commission and equivalent websites for USA based and international companies
- Company websites

- Property information website such as Zoopla and Rightmove (UK) and Zillow and Trulia (USA)

*Public sources for trusts and foundations*

- Charity Commission and other internet sources for UK based not-for-profit organisations
- European Foundation Centre for Europe based not-for profit organisations, GuideStar USA for USA based not-for-profit organisations and equivalent websites for international charities

*Public sources for individuals*

- Rich lists, property websites, The Queen's Honours lists
- Personal websites, blogs and social media such as Twitter
- LinkedIn, to check for business or professional information
- Press sources:
  - E.g. Factiva (subscription) for both national and international press

## 8. How we use data

- 8.1 In simple terms, the personal data we hold may be used to help us effectively carry out our activities.
- 8.2 We will use the information submitted to us to process any donation we receive, to conduct due diligence such as postcode checks and bank verification, to administer our legacy programme, including our Visionaries Circle and legacy enquiries and donations, or to provide any information or service requested from us.
- 8.3 We may process data ourselves or engage a third party to do so on our behalf, subject to entering into a legally compliant Data Processing Agreement in which we remain the Data Controller.
- 8.4 When consent is granted to do so, or where we have legitimate interest<sup>1</sup>, we may use the information submitted to us to notify our stakeholders by email (with consent only) and post about the activities and services of Moorfields Eye Charity, and how they can be supported. We may offer our stakeholders the opportunity to sign up to a mailing list and/or newsletter, to participate in a survey or a competition, or to receive information by email about any other products and services which we provide. We may also contact them by post, phone and with consent by email for certain marketing and fundraising activities, including [appeals, events and highlights from Moorfields Eye Hospital]. You can opt out of receiving marketing communications from us at any time using the contact details in section 9 below.
- 8.5 We may also use supporter information for analysis and market research purposes to help inform us what appeals and activities are working well.
- 8.6 Charitable fundraising is very important to our work. We may use the data we hold to create a profile of our existing and prospective supporters' interests and preferences, and to analyse their ability to provide financial support, so that our communications are as appropriate and cost effective as possible. Please see below for further

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<sup>1</sup> Please see section 10 for a definition of legitimate interest

details on our supporter profiling and research activities. You can opt out of your data being used for these activities using the contact details in section 9 below.

## 8.7 Supporter profiling, research and screening<sup>2</sup>

### *Profiling and prospect research*

- As part of our major donor fundraising programme we undertake research into our supporters and prospective supporters in order to build a profile of their interests in order to better understand their affinity to our work and potential ability to support it. In order to ensure we do not make inappropriate fundraising requests or send irrelevant communications, we undertake this research to understand more about their financial ability and likelihood to make gifts to the charity and/or how they may like to be involved with us. This research may be conducted in-house or through approved and trusted third party partners.
- When undertaking this research into existing and prospective supporters we will collect the types of data listed in section 6.4 of this policy. All research information is sourced from reputable publicly available sources to help us make potentially appropriate approaches to our potential supporters. We have listed the sources of data we use as part of these activities in section 7.3 of this policy. We only seek information that is relevant to our need at the time of research and within the framework of a legitimate interest assessment.

### *Database screening*

- Database screening (sometimes known as “wealth-screening”) is a process used by fundraising organisations to learn more about their supporters using vetted third-party partners who assimilate data available in the public domain to provide information back to the fundraising organisation. This process involves providing the partner with the names and addresses of our supporters, which are matched against socio- and geo-demographic factors to help identify the potential capacity and/or affluence. The database screening partner also overlays data points to identify charitable or professional interests and affiliations and analyses data that indicates connection to our cause such as donation history or affinity data. The database screening partner then helps us to prioritise our database by identifying potential major donors from our wider pool of supporters. We may also identify other potential new supporters this way.
- Our profiling, prospect research and database screening activities exist to ensure we create the best experience for our supporters:
  - Ensuring our communications are relevant, appropriate and shared with the correct audience
  - Engaging supporters with the right members of staff at an event or meeting and helping our staff to prepare for and make the event or meeting more relevant for those in attendance

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<sup>2</sup> The ICO’s guideline sets out expectations around profiling including procedures for individuals to easily access the personal data used to profile them, that we inform individuals about the processing and information used and why, and that we proactively update our privacy information and explain the processing to individuals in a way that helps them to exercise their rights

- Creating connections with notable supporters or other distinguished supporters who could go on to, for example, volunteer or support the charity in other ways
- Developing our fundraising programme in an ethical and sustainable way based on information accuracy, gained through this work
- Helping us conduct our activities efficiently
- Conducting due diligence to ensure we do not develop relationships with supporters, or receive gifts from, untrustworthy or unethical sources
- Continuing to find new potential donors to advance our fundraising objectives and grow our fundraising pipeline. Furthermore, Charity Commission CC20 Guidance states we are responsible for ensuring that our fundraising targets are realistic and money raised is used effectively. Without knowledge on our potential donor base, we would not be able to meet this responsibility
- Adhering to the Code of Fundraising Practice which states that undue pressure should not be placed on a person to donate or to give at a higher level than they could. We cannot ensure this if we do not know the level a supporter could potentially donate.

## 8.8 Events

We may use data collected when registering participants for a Moorfields Eye Charity event for health and safety reasons, so we can ensure that we are able to contact the supporter during an event in case of an emergency – for example taking next of kin details. We may also need to share this information with a third-party provider associated only with the event or activity to help us ensure participant safety, but this information will not be used outside of the specific event or activity.

## 9. Opting out

- 9.1 Where details have been provided to us, we may contact stakeholders by post and phone for certain marketing and fundraising activities. Stakeholders may opt out of this activity at any time by contacting us on moorfields.eyecharity@nhs.net or 020 7521 2565.
- 9.2 Stakeholders can also opt out of their data being used for any profiling, research or database screening exercises. Please contact us using the above contact details if you would like to do so.

## 10. What legal bases do we rely upon to process data

The legal bases that we rely on for processing personal data are:

- 10.1 Stakeholders have provided their consent to us using their personal data for a specific purpose:
- We will ask for consent to use data to send marketing by email and SMS
  - Our stakeholders always have the right to withdraw their consent at any time.

10.2 It is necessary in connection with the performance of an agreement or contract:

Sometimes it is necessary to process personal data so that we can enter into agreements or contractual relationships. For example, if we have agreed to provide you with certain information or services.

10.3 It is necessary for compliance with a legal obligation to which we are subject:

- This would include where we have to retain certain records, for example, to manage health and safety, for the detection and prevention of crime, safeguarding obligations, for maintaining suppression lists to ensure we comply with marketing laws, for tax reasons (such as those related to gift aid donations) and undertaking due diligence before accepting certain donations or entering into certain relationships.

10.4 It is within our legitimate interests.

- Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process personal data when it is not practical or appropriate to ask for consent, and where we are confident that this will not unduly impact individual rights.
- Our legitimate interests include raising funds for activities to support our charitable objectives, including helping Moorfields Eye Hospital to provide the best possible care for its patients, investing in state-of-the-art equipment, educating the researchers and clinicians of tomorrow, and funding research to find better and more effective treatments for blinding diseases. We also have a legitimate interest in publicity and income generation, grant making, campaigning and fundraising in order to support these objectives (including joint fundraising campaigns with our partners) and undertaking due diligence to establish the provenance of donations that are made, or may be made, to us.
- We will also rely on our legitimate interests for the proper administration of the charity, and to manage our operations (for example, maintaining appropriate records and databases, for the detection and prevention of crime and safeguarding all those who access our premises and facilities). When we process our stakeholders' personal data to achieve such legitimate interests, we consider and balance any potential impact on our stakeholders (both positive and negative), and their rights under data protection laws. We will not use personal data for activities where our interests are overridden by the impact on stakeholders, for example where the use of data would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

## **11. Data storage and security**

11.1 The information given to us will be stored on a database and may be used by us for the purposes explained in this policy.

- 11.2 When information is submitted to us, we take steps to ensure that we treat that information securely. Unfortunately, it is not possible to guarantee the total security of any data transmitted over the internet. While we strive to protect our stakeholders' information, Moorfields Eye Charity cannot ensure or warrant the security of any information transmitted to us and this is therefore done at stakeholders' own risk. Once data is transmitted to us, we take reasonable steps to ensure its security on our systems, but we take no responsibility for any unauthorised access or loss of personal information that is beyond our control.
- 11.3 Please remember that other methods of internet communication, such as emails and messages sent via a website, may not be secure unless they are encrypted.
- 11.4 Our stakeholder information is only accessible by staff, volunteers and contractors who are bound by appropriate policies and procedures to protect information.

## **12. Data retention**

- 12.1 Moorfields Eye Charity is committed to ensuring that its approach to data retention complies with data protection legislation and aligns with best practice in the industry.
- 12.2 The personal data that we hold will be destroyed or erased from our systems when it is no longer needed for the purposes for which it was collected. The amount of time may depend on the reason for which we are processing the data and the type of data being processed.
- 12.3 In line with our Data Retention Policy, which is available on request, the charity will retain certain personal data as considered necessary to support the ongoing fundraising, grant making and operational activities of the charity.

## **13. Data sharing**

- 13.1 We care about the details we hold and we will never sell contact details for marketing purposes.
- 13.2 We will not sell, distribute or disclose information without consent, unless we believe in good faith that the law requires it or we have another clear legal basis to do so.
- 13.3 We will not sell or rent contact information obtained from subscriptions to any of our e-communications or e-newsletters, to anyone.
- 13.4 We may provide links to other websites. Before supplying any personal information to any other website, we recommend that our stakeholders check that website's privacy policy – this privacy policy does not apply to such sites. We cannot accept responsibility for the protection of any data supplied to other sites.
- 13.5 We only allow third parties access to our data for the purposes of agreed data sharing or processing. Whilst we may allow our staff, consultants and/or external service providers acting on our behalf to access and use our stakeholders' personal data for the activities we have described in this policy (e.g. to provide services or products, deliver mailings, to analyse data and to process event registration and



payments), we only permit them to use it to deliver the relevant information, goods or services, and only if they apply an appropriate level of security protection, and with appropriate data processing agreements in place.

- 13.6 We occasionally share our supporters' name(s) and contact details with Moorfields Eye Hospital and/or UCL, our fundraising partner, only for the purpose of managing our joint fundraising campaign and in compliance with our data sharing agreements with these partners.
- 13.7 We may need to disclose personal data upon request to regulatory and government bodies as well as law enforcement agencies. We may also merge or partner with other organisations and in so doing, acquire or transfer personal data but the personal data would continue to be used for the purposes set out above.
- 13.8 The personal data we collect may be transferred to, shared with and/or otherwise processed by organisations or companies outside of the UK and the European Economic Area ("EEA"). Where personal data is transferred outside the UK or EEA, we will take reasonable steps to ensure that the recipient implements appropriate measures to protect our stakeholders' personal data (for example, by entering into contracts that have been approved by the UK or EU Commission).

## **14. Use of photography and film**

- 14.1 With consent, we may use our stakeholders' photograph/video to promote the work of Moorfields Eye Charity across a variety of channels:
  - In printed and/or online promotional material
  - For our charity/fundraising events materials
  - In our publications such as our annual report or biannual newsletter Visibility
  - On our website and our social media accounts: Facebook, Twitter, LinkedIn, Instagram and YouTube
  - For single or multiple use for public audiences including publications and presentations
  - For use by our partners Moorfields Eye Hospital and UCL Institute of Ophthalmology for any of the purposes specified above
- 14.2 What does providing consent mean?
  - Moorfields Eye Charity is given consent to use images with name(s) if appropriate, publicising Moorfields Eye Charity activities.
  - The sender of images has received an explanation regarding the use of the images and that their consent can be withdrawn at any time.
- 14.3 We will keep stakeholders' photographs/videos on our files for a maximum of five years, at which point we may contact them to confirm if they re-consent to their use.
- 14.4 Photography and filming is likely to take place at our events. There will be signage to remind individuals of this, but anyone who does not wish to be photographed/filmed or does not consent for images to be used that contain them or members of their family, should inform a member of Moorfields Eye Charity staff and we will ensure that we adhere to those wishes.

- 14.5 Anyone who sends photographs or videos to Moorfields Eye Charity agrees that these may be used by the Charity for fundraising purposes. By sending such photographs or videos to us, our stakeholders are also confirming that anyone featuring prominently in any such photograph or video has consented to their image being sent to us and being used in this way.

## 15. Data protection rights

- 15.1 We have a Data Protection Policy (DPP) in place, detailing the ways in which the charity may process data and how our stakeholders may manage this. Our DPP can be viewed in the attached link and information on how we process data is available on request. (<https://moorfieldseyecharity.org.uk/about-us/our-policies/data-protection-policy>)
- 15.2 You have a right to:
- Be informed about the data we hold on you
  - Access the data we hold on you
  - Update or rectify the data we hold on you
  - In certain circumstances, erase data we hold on you
  - In certain circumstances, ask us to stop processing your data in a specific way
  - Be provided with your data in a portable way
  - In certain circumstances, object to specific processing of your data
  - Object to automated decision making and profiling where there is a significant effect on you

## 16. Notification of changes to this policy

- 16.1 Our privacy policy will be reviewed annually. The policy may also be reviewed and updated if there are any changes in our practice. In each case, the amended version will be published on our website.
- 16.2 If there are significant updates to this policy and if reasonably practicable we will notify our stakeholders of this.

## 17. Queries

- 17.1 Anyone with any queries concerning this privacy policy or the way in which personal data is used by us, please contact us at [moorfields.eyecharity@nhs.net](mailto:moorfields.eyecharity@nhs.net) or on 020 7521 2565.
- 17.2 Our stakeholders are also entitled to make a complaint to the Information Commissioner's Office (ICO). For further information see the ICO's guidance: <https://ico.org.uk/make-a-complaint/>.