

# Jubilee Debt Campaign

## Privacy Policy

### Overview

Jubilee Debt Campaign (JDC) is committed to protecting your data and your privacy. We process personal details in accordance with the Data Protection Act 1998 and the EU General Data Protection Regulations 2016 (GDPR).

We undertake to ensure that any information you give us is held securely and safely. We never share your information with another organisation for their own marketing purposes, and we never sell your information for any reason whatsoever.

This policy explains how and why we gather and use your data in order to further our charitable objectives. If you have any questions about this policy or how your data is handled, please contact us at:

Jubilee Debt Campaign  
The Grayston Centre  
28 Charles Square  
London N1 6HT  
[info@jubileedebt.org.uk](mailto:info@jubileedebt.org.uk)

### Purpose

The only reason we will use your personal information will be to help us effectively carry out our charitable activities, through facilitating either your involvement in our campaigns or your financial support for our work, or both.

### Lawful processing

All organisations in the UK need a lawful basis to collect and use personal data. There are two legal bases that we may use in relation to your details:

#### 1. Information is processed on the basis of an individual's consent

Jubilee Debt Campaign will always ask for your consent to send you marketing by email. Where you give us consent, we will always keep a clear record of how and when this consent was obtained, and you can withdraw this consent at any time by contacting us at [info@jubileedebt.org.uk](mailto:info@jubileedebt.org.uk), 020 7324 4722, or by clicking the unsubscribe link from an email that you receive.

#### 2. Information is processed on it being a legitimate interest for Jubilee Debt Campaign to do so

The law allows personal data to be legally collected and used by an organisation if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

In many situations, the best approach for Jubilee Debt Campaign and our supporters is to process personal data because of our legitimate interests, rather than consent.

Jubilee Debt Campaign's legitimate interests are keeping our supporters updated on the progress of our campaigns, and asking for their help with taking campaign actions, disseminating our campaign materials and donating to support the charity.

We have undertaken an assessment of the way we process our supporters' personal data in order to further these interests, and determined that we are entitled to rely on Legitimate Interests as a legal basis for recording contact details and records of campaign actions taken, and sending direct marketing by post to individual supporters.

If you want to change our use of your personal data for marketing and fundraising activities, you can do so at any time by contacting us at [info@jubileedebt.org.uk](mailto:info@jubileedebt.org.uk) or 020 7324 4722.

We may also share your personal information if we are compelled to do so by a legal authority acting in compliance with the law.

### **What information we collect**

If you give us your details by donating to Jubilee Debt Campaign, taking one of our actions, or signing up to our e-list, we will usually collect your name, address and email address. We also collect information about your engagement with us, such as your communication preferences, your donations, the campaign actions that you take and campaign materials that you order from us. We may keep records of our correspondence with you, and if you sign a Gift Aid declaration we must record the fact that you are a UK tax payer.

We only acquire this personal data when it is given to us directly, or through a third party organisation which engages with our supporters on our behalf, such as iParl (who process our online campaign actions) or Justgiving (who process our online donations).

### **Data retention**

Jubilee Debt Campaign removes personal data from our systems in line with our data retention policy. The length of time each category of data will be retained will vary depending on how long we need to process it, the reason it is collected, and in line with any statutory requirements. After this point the data will either be deleted or rendered anonymous.

### **Data sharing**

Jubilee Debt Campaign will never sell your personal information and will never share it with another organisation for their own marketing purposes. However, there are a number of legitimate situations where we may share your information with third parties whom we have contracted to fulfil specific services for us.

This will include organisations such as mail fulfilment houses and email broadcasters who will send out our marketing materials to our supporters on our behalf. In all of these situations we ensure that we always have a written contractual agreement in place that will ensure that those organisations can only use the data provided for the specific purposes we direct them to do, and that they have in place strict security requirements in order to protect your personal information.

For a list of our current third party contractors, see here. [link to list of data processors]

### **Your rights**

Where Jubilee Debt Campaign is using your personal information on the basis of your consent, you have the right to withdraw that consent at any time. You also have the right to ask Jubilee Debt Campaign to stop using your personal information for direct marketing purposes. Simply contact us on [info@jubileedebt.org.uk](mailto:info@jubileedebt.org.uk) or 020 7324 4722. The law also gives you a number of other rights in relation to your personal data:

**Right to be Informed:** You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

**Right of Access:** You can write to us asking what information we hold on you and to request a copy of that information. Please use our contact details at the top of this policy. From May 2018 we will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

**Right of erasure:** From May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). In many cases we would recommend that we suppress you from future communications, rather than data deletion, as this is a more failsafe way of ensuring you do not receive future communications from us.

**Right of rectification:** If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

**Right to restrict processing:** In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

**Right to data portability:** Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor and is unlikely to be relevant to your relationship with Jubilee Debt Campaign.

**Right to object:** You have an absolute right to stop the processing of your personal data for direct marketing purposes.

**Right to object to automated decisions:** In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions 'that have a legal effect on you', you have the right to object. This right is more applicable to mortgage or finance situations. Jubilee Debt Campaign does not undertake complex computerised decision-making that produces legal effects.

## **Data security**

We store your personal data securely, whether it's held online or offline. All credit or debit card donations made on Jubilee Debt Campaign's website are processed by Justgiving, an electronic payment provider which is compliant with the Payment Card Industry Data Security Standard.

## **Cookies**

A cookie is an alphanumeric text file that is sent from a website and stored on your computer's hard drive by your web browser. Cookies are essential for some websites to operate effectively but also to make your visit to a website a better experience, for example, by remembering who you are, so that when you visit again, it recognises you as a previous visitor.

Jubilee Debt Campaign uses anonymous analytic cookies to track visits to our site and routes around areas of our site. As with other statistics about visitors to our sites, this tracking is anonymous and aggregate, and does not relate to any information we might hold about identifiable individuals.

## **Changes to Jubilee Debt Campaign's privacy policy**

From time to time, we will make changes to this statement to keep it up to date and relevant. Please make sure you check regularly to see what's changed. This statement was last updated on 1 May 2018.

## **What to do if you are not happy?**

In the first instance, please talk to us directly so that we can help resolve any problem or query. You can contact us at [info@jubileedebt.org.uk](mailto:info@jubileedebt.org.uk) or 020 7324 4722. You also have the

right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection, using their helpline 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk).