



## Our Privacy Policy

This policy describes how and why Hostage UK uses your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information. We promise to respect any of your personal information which is under our control and to keep it safe. We aim to be clear when we collect your information about what we will do with it.

We are a small charity with a database of several hundred contacts including our volunteers, partners, beneficiaries and those who support or are interested in our work. We retain some personal information because it helps us to make better decisions about the services we provide, but the vast majority of the personal information we retain is to enable us to send out information about our organisation and its activities in accordance with the requests of these contacts.

This policy is effective from 27 July 2018.

### Who we are

In this Privacy Policy, “**Hostage UK**”, “**HUK**”, “**we**”, or “**our**” means Hostage UK (a registered charity in England and Wales with registration number 1161072). HUK is the data controller under the General Data Protection Regulation 2016/679 and the Data Protection Act 2018 (“**Data Protection Law**”). We’re registered with the Information Commissioner’s Office (ICO) in the UK with registration number Z2430846.

“Our beneficiaries” or “beneficiary” are families of hostages and former hostages to whom we provide our family and hostage support services.

### HOW WE COLLECT INFORMATION ON YOU

We collect information in the following ways:

#### Information you provide to us directly

You may give us your information in order to sign up for one of our events, make a donation, agree to be a volunteer, advisor or ambassador for us, or otherwise communicate with us.

#### Information you provide to us indirectly

We also may receive data about you from subcontractors acting on our behalf who provide us with technical, payment or delivery services, and from our working

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partners, advertising networks and search/analytics providers used on our website and through your use of our website.

You should check any privacy policy provided to you where you give your data to a third party about its data sharing arrangements. If you consider that your personal data was improperly shared with us, please let us know (at the contact details mentioned in this policy) and we will change or restrict the processing of your information as required under the Data Protection Law.

### **Information from other sources**

We also use information from the following sources:

#### **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those services, for example when you publicly tag us in an event photo. There is more information on this later in this Privacy Policy.

#### **Information available publicly**

We supplement information on potential donors with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone's interests and support of HUK. For more information, please see our section on "Building profiles of supporters" below.

### **WHAT PERSONAL INFO WE COLLECT**

We collect, store and use the following kinds of personal information if provided by you or collected about you:

- your name;
- your contact details (including postal address, telephone number, e-mail address and/or social media identity);
- your date of birth;
- your gender;
- your bank or credit card details where you provide these to make a payment;
- if you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have);
- information about events, activities and products which we consider to be of interest to you;

- information relating to your health (for example if you wish us to help you access medical or mental health services, we may need to obtain certain health information from you);
- where you have left us a legacy, any information regarding next of kin with which you may have provided us to administer this;
- information as to whether you are a taxpayer to enable us to claim Gift Aid;
- age, nationality and ethnicity information where provided to us and relevant; and
- any other personal information you provide to us.

Certain types of personal information are in a special category under the Data Protection Law, as they are considered to be more sensitive. Examples of this type of sensitive data would be information about health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information. We collect only a limited amount of this kind of data (if any).

We only collect this type of information about our beneficiaries to the extent that there is a clear reason for us to do so, for example if it is linked to the motive of or treatment during a kidnap or detention and for the purpose of providing appropriate support or facilities to you. We may also collect this information from those supporting our cause if you are taking part in a sporting event. We will also collect this type of information if you make it public or volunteer it to us.

Wherever it is practical for us to do so, we will make it clear why we are collecting this type of information and what it will be used for.

## **HOW WE USE YOUR INFORMATION**

We will use your personal information to:

- provide you with the services, products or information you asked for;
- administer your donation or support your fundraising, including processing Gift Aid;
- keep a record of your relationship with us;
- respond to or fulfil any requests, complaints or queries you make to us;
- understand how we can improve our services, products or information by conducting analysis and market research;
- manage our events;
- check for updated contact details against third party sources so that we can stay in touch if you move (see “Keeping your information up to date” below);
- further our charitable objectives;
- register, administer and personalise online accounts when you sign up to products we have developed;
- send you correspondence and communicate with you;

- process applications for funding and for administration of our role in the projects we fund;
- contact you if you enter your details onto one of our online forms, and you don't 'send' or 'submit' the form, to see if we can help with any problems you may be experiencing with the form or our websites;
- display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer);
- generate reports on our work, services and events;
- safeguard our staff and volunteers;
- conduct due diligence and ethical screening;
- monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and/or personalise information which is presented to you;
- process your application for a job or volunteering position;
- conduct training and quality control;
- audit and administer our accounts;
- meet our legal and/or contractual obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies;
- carry out fraud prevention and money laundering checks;
- undertake credit risk reduction activities;
- our legitimate interests or those of a third party including the beneficiaries; and/or
- establish, defend or enforce legal claims.

## **YOUR INFORMATION MAY BE SHARED WITH US BY THIRD PARTIES**

We will never sell or rent your information to third parties for marketing purposes. However, we may disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf;
- temporary researchers, a member of our advisory panels, any joint funders of projects, host institutions and external members of our committees;
- if you are a legacy giver, we may share information with co-beneficiaries;
- analytics and search engine providers;
- IT service providers.

Some of our suppliers run their operations outside the European Economic Area (EEA) - this may include a country which may not be subject to the same data protection laws as companies based in the UK. In these circumstances, we will take steps to make sure they provide an adequate level of protection, in accordance with the Data Protection Law.

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The third parties we share data with include:

1. Box, Inc., based in Redwood City, California (you can see their privacy policy at <https://www.box.com/en-gb/legal/privacypolicy>)
2. Google LLC based in Menlo Park, California, USA. We use various Google services including Gmail. We may also use Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in Google's own privacy policy. Google may aggregate data they collect from their various services including Google Analytics, Google Translate, Google Maps and YouTube. You acknowledge and accept that we have no control over Google's data collection. You should look at Google's privacy policy (available at <https://policies.google.com/privacy>) for details of their data collection practices. This privacy policy and aggregation of data will also apply to any data you choose to share with Google services using the functionality we provide on our Site.
3. Our bankers – currently HSBC (more details at [www.hsbc.com](http://www.hsbc.com))
4. Our call handlers – currently [insert details]

Our website allows you to connect with a number of social media and other sites and you should check their privacy policies before submitting your data to them. Those sites include:

1. Facebook (privacy policy at <https://www.facebook.com/privacy/explanation>)
2. LinkedIn (privacy policy at <https://www.linkedin.com/legal/privacy-policy>)
3. Twitter (privacy policy at <https://twitter.com/en/privacy>)
4. Vimeo (privacy policy at <https://vimeo.com/privacy>)
5. Just Giving (privacy policy at <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20>)

Additionally we sometimes use different communications channels at the request of people we interact with. Those channels may include WhatsApp whose Privacy Policy is here <https://www.whatsapp.com/legal/>. WhatsApp is owned by Facebook so again there is a risk that Facebook may aggregate data they collect from their various services and you acknowledge and accept that we have no control over Facebook's data collection.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of Hostage UK, its personnel, visitors, users or others. Since we're a registered charity in the UK this may include the Charity Commission - <https://www.gov.uk/government/organisations/charity-commission>.

We reserve the right to disclose your personal information to third parties:

- if we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; and/or
- if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets.

Hostage UK does not share with third parties' data held on our Beneficiaries without their prior consent, with the exception of data lawfully requested by law enforcement agencies, tax authorities or the Charity Commission.

We also share your personal information for required or related purposes for which it was provided, for example:

- professional fundraising agencies;
- independent event organisers, for example the London Marathon or fundraising sites like Just Giving or Virgin Money Giving;
- if you sign up as a volunteer for us through a Job Centre or external volunteering website;
- governmental and/or other authorities involved in our activities;
- third parties involved in our activities;
- our service providers including support services, legal, financial, audit and other professional advisors.

## **HOW WE USE YOUR INFO TO TELL YOU ABOUT WHAT WE DO**

### **Sending marketing communications**

Our marketing communications include updates on our events and activities and relevant information about hostage-taking and family and hostage support. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We operate an 'opt-in only' communication policy. This means that we will only send marketing communications to those that have confirmed or otherwise expressed that they are happy for us to do so.

We may use information you have given us directly, for example the record of your previous donations to and/or relationship with us, your location and demographics, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

### **Events and fundraising**

When you have asked for details of a Hostage UK event, we will send you information including, where relevant, ideas for fundraising and reminders on key information about the activity.

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Where you have signed up for an event with a third party (for example the London Marathon) and told the event organiser that you wish to fundraise for us, we may contact you with information and support for your fundraising for that event.

## **Managing your contact preferences**

We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine, and you can change your preferences at any time. Just let us know when you provide your data or contact us on [info@hostageuk.org](mailto:info@hostageuk.org)

If you've decided you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you've made and any related Gift Aid, thanking you for a donation or participation in an event, or keeping in touch with you about volunteering activities you are doing for us.

## **Building profiles of our donors, those who support our cause and our beneficiaries**

At Hostage UK, our family and hostage support services are only made possible thanks to the generosity of those who support our cause. Where individual donors are concerned it is vital that our fundraising efforts are as effective as they can be. By developing a better understanding of our potential donors through researching them using publicly available sources we can tailor and target our fundraising events and communications (including volunteering opportunities) to those most likely to be interested in them. This allows us to be more efficient and cost-effective with our resources, and also reduces the risk of someone receiving information that they might find irrelevant, intrusive or even distressing.

### *What information do we collect?*

After taking an individual's communications preferences into account, we use information we hold to send them information about our activities, services and events which may include requests for donations from time to time.

Where we are contacted by a beneficiary, we collect information from you about the incident regarding which you have contacted us, as well as personal information about you or the hostage where relevant to the provision of our services.

### *Which information do we use?*

We use existing data from Hostage UK's own database and combine this with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and

Companies House in order to create a fuller understanding of someone's interests and possible support of HUK. We only use reputable sources, where someone would expect their information may be read by the public. We avoid any data that we believe has not been lawfully or ethically obtained, and we do not use information sources which have not been broadcast or made public.

We're committed to putting you in control of your data and you are free at any time to opt out from this activity. To find out more, please email [info@hostageuk.org](mailto:info@hostageuk.org)

## **LEGAL BASIS FOR PROCESSING**

The Data Protection Law means that our use of personal information must have a "legal basis" as follows:

### **Specific consent**

Consent is where we ask you if we can use your information in a certain way, and you agree to this (for example when we send you marketing material via e-mail). Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

### **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, Information Commissioner or Gambling Commission, or to use information we collect about you for due diligence or ethical screening purposes.

### **Performance of a contract / take steps at your request to prepare for entry into a contract**

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are receiving training from us, applying to work/volunteer with us, or being funded to undertake research.

### **Vital interests**

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, if there were to be an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

## **Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities Hostage UK carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- analysis and profiling of our supporters using personal information we already hold;
- updating your address using third party sources if you have moved house (please see the “Keeping your information up to date” section below for more on this).
- use of personal information when we are monitoring use of our website or apps for technical purposes;
- use of personal information to administer, review and keep an internal record of the people we work with, including supporters, volunteers and researchers;
- sharing of personal information between relevant teams and committees within Hostage UK and between Hostage UK and Hostage US ;
- where you have signed up with us on a charity place for a third party event (for example a sponsored run not organised by Hostage UK), sharing personal information with the third party event organiser so they can administer the event.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under the Data Protection Law do not override our (or others’) interests in us using your information in this way.

When we use sensitive personal information (please see the “What personal information we collect” section above), we require an additional legal basis to do so under the Data Protection Law, so will either do so on the basis of your explicit consent or another route available to us at law for using this type of information (for example if you have made the information manifestly public, we need to process it for employment, social security or social protection law purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

## **HOW WE KEEP YOUR INFORMATION SAFE**

We ensure that there are appropriate technical and organisational controls (including physical, electronic and managerial measures) in place to protect your personal details.

## **FOR HOW LONG DO WE KEEP YOUR INFORMATION**

Hostage UK has specific criteria to determine for how long we will retain your information, which are determined by legal and operational considerations. For instance, we are required to keep some personal information for tax or health and safety purposes, as well as keep a record of your interactions with us. We may also need to retain records of our case work for legal reasons. We will not retain your information for longer than seven years after the purposes for which it has been provided has passed. If you would like to know for how long we hold your specific information, please contact [info@hostageuk.org](mailto:info@hostageuk.org).

## **KEEPING YOUR INFORMATION UP TO DATE**

We may use information from external sources to identify when we think you have changed address so that we can update our records and stay in touch. We only use sources where we are confident that you've been informed of how your information may be shared and used.

We do this so we can continue to contact you where you have chosen to receive marketing messages from us and contact you if we need to make you aware of changes to our terms or assist you with problems with donations.

This activity also prevents us from having duplicate records and out of date preferences, so that we don't contact you when you've asked us not to.

We're committed to putting you in control of your data and you're free at any time to opt out from this activity. To find out more, please contact [info@hostageuk.org](mailto:info@hostageuk.org).

We would really appreciate it if you let us know if your contact details change.

## **YOUR RIGHTS**

Under the Data Protection Law, you may have rights to make requests about the personal information that we hold about you. We've summarised these below:

### **Right to access your personal information**

You may have a right to request access to the personal data that we hold about you. You may also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see by post to Hostage UK, PO Box 507, Manchester M28 8EP, United Kingdom or by email to [info@hostageuk.org](mailto:info@hostageuk.org)

### **Right to have your inaccurate personal information corrected**

You may have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

### **Right to restrict use of your personal information**

You may have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

### **Right to erasure of your personal information**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

### **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

### **Right to object to the use of your personal information**

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you may have a right to object to our use of your information.

If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you want to exercise any of the above rights, please contact us on Hostage UK, PO Box 507, Manchester M28 8EP, United Kingdom or by email to [info@hostageuk.org](mailto:info@hostageuk.org). We may ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office (ICO(link is external)).

## **COMPLAINTS**

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. Please contact [info@hostageuk.org](mailto:info@hostageuk.org). We appreciate the opportunity this feedback gives us to learn and improve.

You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office (link is external), the UK data protection authority.

## **CHANGES TO THIS POLICY**

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the Hostage UK Website or by contacting you directly.

## **CONTACT US**

If you have any questions, comments or suggestions, please let us know by contacting our team. Our contact details are:

Email: [info@hostageuk.org](mailto:info@hostageuk.org)

Local rate helpline: 0845 608 1360

Post: PO Box 507, Manchester, UK, M28 8EP.