

Version: April 2021

Welcome to the Wellgiving's privacy policy. [Wellgiving] is the data controller and responsible for your personal data (collectively referred to as "Wellgiving", "we", "us" or "our" in this privacy policy). Wellgiving is committed to protecting your personal data and respecting your privacy. This privacy policy explains the information we collect, how we use and look after it and your rights in connection with our website, related mobile application and services (collectively, our "**Services**").

1. IMPORTANT INFORMATION

QUESTIONS AND CONTACT INFORMATION

If you have any questions about this privacy policy or our privacy practices, including any requests to exercise [\[your legal rights\]](#), please contact us using the following details:

support@wellgiving.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review and reserve the right to modify it at any time. This version was last updated on the date stated at the beginning of it. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- identity and contact details, including your name, title, **date of birth, gender,** billing address, email address **and telephone numbers.**
- profile and order information, including your username or similar identifier and password, details of your purchase, bank account and payment card details.
- usage data including information about how you use our Services.
- connected devices and apps information.
- communications data including any information you provide or submit to us as part of communications with us.
- technical data (please see “[Automated technologies or interactions]” below).
- for employees, consultants and applicants, the information you have provided to us in the course of your employment with us, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, bank account details, emergency contact, pension fund details and national insurance number

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature of our Services. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any information about criminal convictions and offences]

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to provide you with the benefit of our Services or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel availability of our Services to you but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your data by filling in forms or by corresponding with us. This includes, for example, personal data you provide when:
 - create an account to use our Services;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see “[cookies]” below for further details.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where it is necessary in order to enable you to use our Services.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

CONSENT

Generally, we do not rely on consent as a legal basis for processing your personal data.

We seek express opt-in consent before we use your personal data for marketing purposes. You have the right to withdraw consent to marketing at any time by contacting us and, subject to our retention policy (see “[data retention]” below, we will dispose of your personal data securely.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

PRIVACY POLICY



We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To install our app, and/or register you as a new customer	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver our Services including: Manage payments, fees and charges Collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship and communicate with you which will include: Notifying you about changes to our terms or privacy policy Addressing your requests and inquiries Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our Services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure or	Necessary for our legitimate interests (to study how customers use our products/services, to

understand the effectiveness of the advertising we serve to you	develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our Services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about Services that may be of interest to you	Necessary for our legitimate interests (to develop our Services and grow our business)
If you are an employee, consultant or applicant, to manage the recruitment and employment process, carry out background checks, and conduct out business	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our internal records updated and grow our business)

COOKIES

We use cookies in providing our Services. A cookie is a small piece of information that may be stored on your web browser when you visit a website. In principle, cookies are used to personalise your web experience and offer users additional features on a website. For example, they may be used to help you navigate a website, to allow you to continue using a website where you left it and/or to save your preferences and settings when you return to the website. Cookies cannot access, read or modify any other data on your device.

We use the following cookies:

[DETAILS TO BE CONFIRMED]

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Services may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data for the purposes set out in the table “*Purposes for which we will use your personal data*” above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please note that this privacy policy does not apply to any third party websites. If and to the extent that we provide links to third party websites, we do not have control over, do not review and are not responsible for such websites or their content.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of 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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see “[*your legal rights*]” below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request restriction** of processing your personal data. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

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- **Request transfer** of your personal data to another party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.