

# Privacy Notice

## Introduction

We're committed to respecting your privacy and keeping your personal information safe, whether you are a supporter, volunteer, shopper or campaigner. This Privacy Notice applies to all personal information we collect or process about you; it sets out how and why we obtain and use your personal information, as well as how we protect it.

This Privacy Notice was prepared to be as concise as possible. It does not provide exhaustive details of all aspects of the RSPCA's collection and use of your personal information. There may be a separate Privacy Notice which describes how we use your data in specific cases, e.g. if you are a member of staff, apply for a job with us or enrol in a specific event or programme. However, we are happy to provide any additional information or explanation when needed. Please see the ["How to contact us"](#) section for more information.

We may update this notice from time to time without notifying you, so please check it regularly, but if we make any significant changes, we will notify you.

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This Privacy Notice was last updated on 17th March 2023.



## Who we are

The RSPCA is the leading animal welfare charity. It has been established since 1824 and works to prevent cruelty, promote kindness towards and alleviate suffering of animals, by all lawful means - there is more information [about our constitution](#).

The Royal Society for the Prevention of Cruelty to Animals is a charity and body incorporated by statute (registered charity number 219099) ("RSPCA"). We also have:-

- our wholly owned subsidiary trading company, RSPCA Trading Limited (company number 1072608) ("RTL"), which runs our online shop (our shop is outsourced to a data processor and has its own [privacy policy](#)); and
- our subsidiary charitable company, Freedom Food Ltd known as RSPCA Assured (registered charity numbers 1059879 and SC038199 (Scotland) and registered company number 02723670) ("RSPCA Assured"), which is responsible for our farm animal welfare labelling and assurance scheme.
- our local branches and affiliated charities who deliver localised animal welfare services throughout England and Wales. Our branches work to RSPCA welfare standards but are separately registered charities in their own right and have their own privacy policies.

The RSPCA, RTL and RSPCA Assured are each registered with the Information Commissioner as Data Controllers under the Data Protection Act 2018.

This Privacy Notice explains how the RSPCA and RTL use personal information. All references to 'we', 'us' or 'our' in this notice refer to both the charity and trading company. RSPCA Assured has a separate [privacy notice](#).

## How and when we collect information about you

We may collect personal information from you when you interact with us or with third parties with whom we work. We may also supplement the information we hold about you with information that is available to the public, when you visit our website or interact with any of our online content.

### A. When you interact with us

There are many instances when we will collect personal information from you directly. These include, but are not limited to, when you:-

- subscribe to our publications or newsletters, request information from us or become involved in one of our campaigns;
- use our veterinary services;
- volunteer or fundraise for us, or sign up for an RSPCA event;
- pledge or make a donation;
- adopt or foster an animal from us or sign up for 'Home for Life' registration;
- apply for a job with us;
- apply for membership of the RSPCA and/or a branch;
- if you are a teacher, sign up for our education resources or take part in any of our education programmes; or
- ask a question, report cruelty or make a complaint.

### B. When you interact with third parties

There are many instances when we will collect personal information from you indirectly. These include, but are not limited to, when:-

- You report an animal welfare incident by calling our National Control Centre;
- you engage with one of our branches;
- you sign up for events in aid of the RSPCA, such as the London Marathon;
- you fundraise for us through sites such as JustGiving or Virgin Money Giving;
- you purchase an item from the online shop or mail order catalogue
- we receive a referral to deliver programmes for you;
- you participate in a campaigning action with a partner; or
- you access and engage with our social media platforms such as [Facebook](#), [WhatsApp](#), [LinkedIn](#), [Twitter](#) or [Instagram](#), depending on your settings or the privacy policies of those social media and messaging services.

### C. When you visit our website

We may gather information when you visit our website through the use of cookies. Cookies are created by your web browser and each time you visit our website your browser will send a cookie file

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back to the website's server. That file enables us to measure, and where necessary improve, the functionality of our website and enhance your online experience. You can find out more about [the types of cookies we use, how we use them and how you can control your preferences](#).

#### D. Publicly available information

Sometimes we may supplement what we know about you with information that is available to the public. This enables us to ensure, for example, that our communications with you are relevant and tailored to your interests. For example, if you have an existing relationship with us, we may use the Royal Mail's National Change of Address Database periodically to check that we are holding your current address; that way, you won't miss any communications that you may have requested from us and it enables us to better direct our resources. Also, if you are applying to be a trustee of the RSPCA, we may conduct searches against public registers to ensure that you are not disqualified from acting as a trustee.

We also regularly check for deceased and gone-away records to ensure that our data remains accurate, up to date and compliant, and we may use external agencies to assist us with those checks. When administering legacies, we endeavour to rely on information that has been provided to us by Executors/Administrators that have been appointed by the Will but we may also need to use the government's Probate Search facility in order to obtain a copy of the Will. We may also be notified of the death of supporters by third parties, such as solicitors, particularly if we have been named as a beneficiary in a Will.

When signing up for a service (e.g. Royal Mail redirection), you may have agreed for your data to be passed to other organisations, such as ours. We may then use that information to contact you about our work and any resources that may be available to you, subject to your communication preferences.

## What personal information we collect about you

Personal data is any information that relates to an identified or identifiable living individual. We only collect personal data that is relevant to the interaction you have with us and depending on that interaction, the personal information we may collect from you could include, but is not limited to, any of the following:-

- Identity and contact information, such as your name, postal address, telephone number, mobile number, email address and your communication preferences (including your preferences for receiving marketing from us);
- We may collect your date of birth in order to verify you are an adult as some services we offer, such as animal adoptions, are not open to individuals under the age of 18. If you are a minor, we may require the name and contact details of a parent or other legal guardian and, where appropriate, the name and location of your school;
- Donation and transaction information, including details about donations you have made, tax details for Gift Aid purposes and other details of products and services you have obtained from us. (Please note, we do not store credit card information);
- Images, photographs or videos if you volunteer or take part in an event with us;
- Technical information if you visit our website, such as your IP address, the device you use or your browser type and version;
- Usage information including information about how you use our website, products and services;
- Any other relevant information you share with us about yourself, such as your interests or affiliations with other charities including RSPCA branches, or that we obtain about you from publicly available sources.

## Does the RSPCA process sensitive personal information?

Data protection legislation recognises certain categories of personal information as requiring particular care; that data is known as “special category data”. Examples of special category data are health information and information regarding race, religious beliefs and political opinions.

We don't collect special category personal information unless there is a clear reason for doing so and we have a legal basis. Clear notices will be provided on application forms and communications which collect special category data so you will know what information we need and why we need it. Only those individuals with a business need to access and process that information will be able to do so.

Examples of where it would be appropriate for us to collect special category data:-

- where you are participating in a marathon or similar fundraising event, and we need certain information about your health in order to support you in participating in the event;
- if you apply for a job with us, we may collect information about your race or ethnicity, religious beliefs or sexual orientation for equal opportunities monitoring. We may also collect information about criminal convictions if it is appropriate given the nature of the role you are applying for. (We provide a separate HR data protection policy to all employees on induction setting out more information about this category of data, how it is collected, used and stored);
- if you have disclosed such data to us through the course of your relationship with us.



We may also hold personal, special category and criminal offence data in connection with our investigation and prosecution of potential offences relating to the care, transportation and general welfare of pets and other animals.

## How we may use your information

We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your data in a certain way
- where the processing is necessary to carry out for the performance of a contract with you
- where the processing is necessary in order for us to comply with a legal obligation; or
- where it is in our legitimate interests to perform our functions, for example, processing donations or sending you administrative communications where our legitimate interest is to raise funds and to deliver our charitable purposes

## Service providers

We use service providers (such as fundraising agencies, prospect research companies, direct mailing companies, mobile marketing providers, payment processors, market research companies and software platform providers) to help us provide you with our services. For example, Capita is the data processor responsible for delivering our National Call Centre and Civica administers our annual meeting and elections.

We may give relevant persons within these service providers access to your personal information, but only to allow them to perform their services for us. Some service providers may be based outside of the European Economic Area (EEA) however, we will endeavour to ensure that any data transfers outside of the EEA are carried out in compliance with relevant data protection legislation and that the processing of your data is subject to appropriate security measures. This may include engaging service providers that are accredited under the EU-US Privacy Shield, entering into EU approved model contracts or taking other steps to assess the adequacy of overseas suppliers.

## Legal requirements

We may disclose your personal/sensitive personal information when required to by law, for example, to HMRC for tax purposes or to police forces for the prevention or detection of crime. Further, we safeguard the sharing of such information by using formalised information sharing agreements with organisations where appropriate, or on an ad hoc basis after ensuring the request and disclosure are legally compliant.

When we conduct prosecutions, we may publish the identity of the defendant in court alerts and press statements.

## Data research and accuracy

On occasion we may also use your personal information for research purposes so that we can improve our services and better meet the needs of our beneficiaries. This may include us contacting



you to see if you would like to become involved in one of our research projects. We also feature case studies on our website and materials about the amazing work that our supporters undertake for us. In both instances we will always obtain your prior consent before using your data in these ways. We continually strive to improve the quality and accuracy of the information you have provided, such as your contact details, by checking against external data lists such as the Post Office's National Change of Address database & The National Deceased Register. This helps us ensure our records are fully up-to-date and to avoid misdirecting communications.

Other ways we may use your information:

### Rehoming an animal from us

When you apply to rehome an animal from us, we'll need to share personal information such as your name, address and telephone number, to enable a home visit by one of our volunteer home-visitors. We try to make sure that all animals are microchipped when they are rehomed from us; this is a legal requirement in relation to dogs. We will share your personal information with a microchip company in case your animal goes missing. Depending on which microchip is used, this will be one of the following providers: AVID, Anibase or Petlog. If you rehome a cat or dog from us, we will also share your personal information with MORE THAN, our pet insurance provider, so they can offer you six weeks free pet insurance. If you take this up, MORE THAN will contact you with an offer to extend the cover after the free period ends.

### Signing up for Home for Life

We will also collect and process your data, and that of a nominated family member or representative when you sign up to our Home for Life scheme. This is so that we can send you a Home for Life registration pack and administer the scheme.

### Volunteers and job applicants

If you apply for a job with us or volunteer, we'll hold the personal information you provide to process your application.

We may undertake monitoring of recruitment statistics, in line with employment and data protection law. If we need to disclose information to a third party, we will not do so without asking you beforehand unless the disclosure is required by law. For example if we need to take up a reference, or obtain 'disclosure' from the Disclosure & Barring Service.

If you apply to work with us we'll only hold your data for the purposes of that application. We won't hold your personal information for any longer than is necessary for the purposes of that application. Our Branches may also share volunteer information with us, for the purposes of keeping a register of current volunteers. Further, your personal information will be held and processed so that we can





contact you about future volunteering opportunities. We'll only hold information relating to the nature of your voluntary work and we'll delete it in accordance with our retention policies.

## Visitors to our website

When someone visits [www.rspca.org.uk](http://www.rspca.org.uk) or associated websites, we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as how our website was accessed, and the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google Analytics to make, any attempt to find out the identities of those visiting our website. If we do want to collect personal information through our website, we will make this clear and explain what we will do with it.

We also use click through and open mail tracking when sending emails so that we can check whether the recipient has opened an email, unsubscribed, or clicked on a link to our website. This enables us to assess the effectiveness of our email campaigns.

## Cookies

We use cookies to help us make our website better. Cookies are small text files that sit on your device so that our website will remember you.

To help us create a more effective website that reflects users' needs, we use cookie files to collect and record information about how our site is used and collect your IP address (a number that identifies a specific computer or other internet device) for system administration and to report aggregated information.

For more information on cookie files and IP addresses read [our cookies policy](#). By continuing to use our site, you agree to our use of cookies.

However, if you wish to restrict or block the cookies which are set by our websites, or indeed any other website, you can do this through your browser settings. The 'Help' function within your browser should tell you how. Please be aware that restricting cookies may impact the functionality of some areas of our website.

## Passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

## Information security

We ensure your data is kept secure by using up-to-date security features and procedures and we respect the privacy of all visitors to our website.

## Associated websites

This Privacy Policy applies to our externally hosted websites as listed below:

- [shop.rspca.org.uk](http://shop.rspca.org.uk)
- [www.rspca-breakingthechain.org.uk](http://www.rspca-breakingthechain.org.uk)
- [www.science-ethics-animals.org.uk](http://www.science-ethics-animals.org.uk)
- [www.rspca-education.org.uk](http://www.rspca-education.org.uk)
- [hub.rspca.org.uk](http://hub.rspca.org.uk)
- [lottery.rspca.org.uk](http://lottery.rspca.org.uk)
- [raffle.rspca.org.uk](http://raffle.rspca.org.uk)

This privacy notice also applies to our associated websites:

- [science.rspca.org.uk](http://science.rspca.org.uk)
- [young.rspca.org.uk](http://young.rspca.org.uk)

Our website may also include links to other websites, not owned, associated or managed by the RSPCA. Whilst we try our best to only link to reputable websites we cannot be held responsible for the privacy of information collected by sites not managed by us, nor can we accept responsibility or liability for them. For this reason you should consult the privacy notice on any external website you link to before you submit any personal information to those websites.

## Reporting a concern about animal welfare to us

When reporting an animal welfare concern to our cruelty helpline, we will treat your personal information in confidence and will only share it in the circumstances mentioned below or where we are authorised to do so by law.

We use your personal information for the purposes of animal welfare and for the prevention and detection of crime and to provide brief updates to you in relation to the investigation if requested.

We do not use your personal information for any other purpose unless we obtain your prior consent to do so. For example, where as a result of your telephone call to our cruelty helpline you wish to make a donation to us, your personal information will be used to process this donation and to keep in contact with you, only if you agree to us doing so.

Depending on the nature of your concern, we may need to pass information to enforcement agencies such as Trading Standards, Animal Plant and Health Agency (APHA), or law enforcement or to another animal welfare charity. We will only pass on your personal information where it is necessary for the purposes of investigating or resolving your concern.

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From time to time we undertake statistical research on calls to our cruelty helpline to help us manage our service better. This data is anonymised and does not identify individuals, personal data. We also use data and information from calls to our cruelty helpline as the basis for case studies for our educational, training, fundraising and marketing material, in our annual review and potentially for TV programmes featuring our work. Any personal data is always anonymised.

From time to time we also carry out customer service questionnaires which are conducted only for the purpose of measuring your satisfaction with the way your call was handled by our cruelty helpline in order to improve our service. These surveys are anonymous and you will be asked for your consent to be contacted for this purpose.

## Purchasing a product from our online shop or mail order

When you purchase an item or product from our online shop or mail order catalogue, we will collect certain information from you including your name, address, phone number, email address, gift aid status, marketing preferences and payment details, so that we can process your order or contact you if we have any queries regarding your order. Orders will be processed by our supplier Suttons Consumer Products Ltd.

Where you have given us your consent, we may send you information about other products that may be of interest to you by post, email, SMS or contact you by phone.

When you provide RTL (the trading company that runs our online shop) with your data it will be held and processed by the RSPCA. Depending upon the communication preferences you select when registering your details, the RSPCA may then also contact you for fundraising and marketing purposes.

RTL will not use your personal data for any other purpose unless you explicitly instruct it to do so.

## Data profiling and analysis

We may also carry out analysis of the personal information we collect about you and add publicly available information to create a profile of your interests, preferences and your ability to support us, including the amount or level of potential donation or legacy you may be able to give.

This is so we can contact you in the most appropriate way and with the most relevant information, which enables us to raise funds sooner and more cost-effectively.

This information is compiled from sources such as public registers (e.g. listed Directorships), the electoral roll, newspaper articles and social media posts.

Please let us know if you would prefer us not to process your data in this way by telling us when things change.

## Children and vulnerable persons

### Vulnerable persons

We place great importance on the safety of vulnerable persons. See a copy of our Vulnerable Persons policy [RSPCA Fundraising Policy on Vulnerable People](#).

### Children's personal information

We are committed to protecting the privacy of young people who want to fundraise for us or who are junior members of the RSPCA or who take part in educational events at schools or who enter our competitions such as our [RSPCA Young Photographer Awards](#).

Our competitions and fundraising events may request specific information about the age of participants. Where appropriate we will seek the consent from a parent, guardian or carer before collecting information about young people under 16.

## What we use your information for

We will only use your personal information for the purposes for which it was collected as stated or communicated with you (for example via this privacy notice or a 'fair processing' notice). We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities.

The law requires us to only process personal data where we have a valid legal basis for doing so. You can find out more information on [the different legal bases that we rely upon](#).

We may use your information for the following purposes (your information might not be used for all the reasons set out as it will depend on your relationship with us):-

- Animal welfare purposes:-
  - Responding to a concern about animal welfare reported to us or request for help with an animal;
  - Rehoming or fostering an animal from us, including home checks;
  - Providing subsidised veterinary services;
- Administrative purposes:-
  - Processing and administering your donation, including processing Gift Aid, where applicable;
  - Providing you with the goods or services you have requested or paid for which may include complaint handling;
  - Administering our website, and monitoring and tracking its use to enable us to improve user experience;
  - Keeping a record of your relationship with us;
  - Administering legacies;
  - Understanding how we can improve our services, products or information, including inviting you to participate in surveys or research activities;
  - Managing your communication preferences, including marketing preferences;
  - To process a job, volunteering or apprenticeship application;
  - Administering your membership and keeping our register of RSPCA and branch members up to date;
  - Analysing our legacy promises alongside our future financial planning;
- Marketing and fundraising:-
  - Keeping you up to date with the work we do (relating to our work both in the UK and abroad) and asking for financial and non-financial support;
  - Telling you about how you can support the RSPCA by volunteering your time or using your influence to progress our aims;
  - Sending you details of products you can buy from our online shop and giving you information on similar products if you have already purchased from us;
  - Inviting you to events and to take part in campaigns and support our advocacy work;
  - Managing your communication preferences, including marketing preferences;
  - When you provide RTL (the trading company that outsources the running of our online shop) with your data it will be held and processed by RTL and the RSPCA us and depending on the communication preferences you select when registering your details, it may prompt us to contact you for fundraising and marketing purposes too. RTL will not use your personal data for any other purpose unless you explicitly instruct it to do so;

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- In limited circumstances, we may also use publicly available information to create a profile of your interests and preferences in order to understand the level of support you may potentially be able to give us. You can find out more information about [making our work more unique to you](#).
- Where we are required by law:-
  - Complying with charity law;
  - Managing our people and events safely and ensuring we are inclusive and in line with provisions in the Equality Act 2010;
  - Microchipping animals;
  - Assisting the police or any other regulatory or government authorities investigating suspected illegal activities.

You decide how you want us to contact you, whether by post, email, phone or text message and you can update your communication preferences at any time by [telling us when things change](#). From time to time we may also send you a communication asking you to confirm whether you still wish to hear from us or to update and refresh your communication preferences.

## Making our work more unique to you

We endeavour to provide our supporters with a great experience and communicate with them in the best and most cost effective way possible to enable us to divert more funds to our vital animal welfare work.

In order to ensure we send communications to you that are relevant to your interests, in line with your preferences and level of potential donations, we may carry out prospect research to ensure we deliver relevant and timely communications to you that you want to receive.

Prospect research involves the gathering of information about an individual or a group of individuals and analysing their characteristics or behaviour patterns in order to understand them, their interests or likely behaviour. It enables the RSPCA to inform the relevance of its fundraising activities and helps us to identify possible new supporters. There are lots of ways that prospect research can be carried out; we use data matching, segmentation and high value donor analysis.

## Philanthropy

The RSPCA, like many other charities, undertakes research and screening techniques in order to engage with suitable high value donors. We do that by reviewing publicly available information to create a profile of your interests, preferences and your ability to support us, including the amount or level of potential donation or legacy you may be able to give. That research may be undertaken for both existing and prospective high value donors.

We undertake this research so we can contact you in the most appropriate way and with the most relevant information, which enables us to raise funds sooner and more cost-effectively. This individual approach helps us to provide the best possible donor experience that is aligned with your interests and capacity to give, and it enables us to be more efficient with our resources. We may also use prospect research to exclude people who may be vulnerable from marketing.

We identify potential high value donors in a number of ways:-

- By carrying out research on donors who have given £1000 or more.
- By asking our existing high value donors to give again.
- By inviting potential high value donors to attend our supporter events as a way of engaging them with the work that we do. We also identify potential new donors by researching event attendees who were previously unknown to us.
- By researching people who have not given to the RSPCA in the past but who we believe may have a connection to our cause and have the capacity to give significantly.
- By asking our donors and influencers to open up their networks to us.
- By asking our donors and influencers to introduce us to potential donors we have identified through our research and that they have a link to.

We compile information from a number of sources such as public registers (e.g. listed Directorships and trusteeships on the Companies House and the Charity Commission websites), public LinkedIn and social media profiles, Who's Who, newspaper and online articles. The type of information we collect can include a career overview, gift capacity, areas of interest, history of giving to the RSPCA and others, and public information on any philanthropic activities. We may sometimes use third parties to capture some of our data, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in line with the requirements set out in the UK GDPR. We would then inform you of the processing we undertake when we first contact you and then at further regular intervals throughout the lifetime of our contact with you.



We might also ask existing supporters or volunteers whether they would be prepared to open their networks up to us, and if we discover that someone in our network knows a potential donor that we have identified, we might ask them to facilitate an introduction. Here, we would advise our existing supporters about our data responsibilities and ask them to ensure that the individual in question is happy for an introduction to take place. Following the introduction, we would direct the individual to this privacy notice and confirm their marketing and communication preferences.

Our Philanthropy and Partnerships team foster long term relationships with our existing and potential donors. However, we are committed to ensuring any information collated is not excessive or intrusive, and is sourced reliably and appropriately. We are also committed to only keeping data on individuals with whom we have an active relationship. Where we decide not to make contact, we will delete all personal data obtained, other than basic contact details, to which we will apply a suppression flag to ensure we do not make contact in the future.

Please let us know if you would [prefer us not to process your data in this way](#).

### Postcode analysis

We may use the [Mosaic, postcode-based segmentation tool from Experian Ltd](#) to understand the demographic make-up of geographical areas of the UK. We use the tool by matching anonymised information for existing supporters to Mosaic. This allows us to get a better understanding of those individuals and how we can best, and most effectively, target our fundraising to reach new supporters and maximise the use of our charitable funds. We also use the demographic information we have learnt to segment our supporter database and this enables us to tailor our marketing communications.

### Facebook custom audience advertising

The RSPCA uses social media and other internet platforms to communicate with people and share information about the vital work that we do for animal welfare.

We also use Facebook custom audiences to place targeted adverts in news feeds. This is done by encrypting the personal data of our existing supporters to create an audience; that audience is then linked to Facebook, which will determine if you have an account and if you do, you will be served digital advertising campaigns. For example, if you have previously purchased a ticket for the RSPCA Lottery, we may seek to place an advert promoting the purchase of additional tickets for the latest draw in your Facebook feed.

We only carry out this activity if you have already consented to us sending you marketing via email and we will only serve you content that we think may be of interest to you. Your personal data is also deleted from any applications used to undertake this activity as soon as it is no longer needed for that purpose.

If you do not want your information to be used by us in this way, you can [change your marketing communication preferences](#) at any time. You can also [manage the targeted advertising you receive from us on Facebook](#) by referring to the instructions provided by Facebook.

### Legal basis for processing

The law requires us to only process personal data where we have a valid legal basis for doing so. We only process your information in accordance with the law.



## What are the legal grounds for processing personal data?

There are six different legal grounds for processing personal data (plus additional conditions where sensitive personal data is used). The legal basis that we rely on for processing your data will depend upon the circumstances in which that data is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your information in a certain way - for example using your image to publicise an event, forwarding your details to one of our branches, or sending you fundraising communications by email or, text;
- where the processing is necessary for the performance of a contract with you - for example we will need to process your name, address and other details in order to rehome an animal to you, provide veterinary services or consider an application to work or volunteer with us;
- where the processing is necessary in order for us to comply with a legal obligation - for example, providing information to HMRC for tax purposes or to police forces for the prevention or detection of crime; or
- where it is in our legitimate interests to process your data and our use of that information does not unfairly impact on your rights and freedoms - for example, communicating with you in line with your interests as a supporter by post or phone (including fundraising, unless you opt out, and carrying out research and analysis on the demographics, interests and behaviour of our supporters or those with an affinity with animal welfare to better understand your interests and motivations, based on postcode areas.
- where the processing is necessary in order to protect someone's life - for example, where we are investigating an animal welfare complaint and an individual connected with the incident raises concerns that we feel should be communicated with the police in order to protect individuals.
- where the processing is required in order to carry out a task that is in the public interest - for example, this legal basis is relevant to our investigation and prosecutions work, where we are seeking to enforce animal welfare legislation.

Where we process sensitive personal data, the RSPCA will only do so in accordance with one of the additional lawful conditions for processing that type of data. For example, when we have your explicit consent.

## What are the RSPCA's legitimate interests?

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

Examples of the RSPCA's legitimate interests include:-

| Our interests   | Data Processing activities   |
|---|--|
| Providing animal welfare services for the benefit of the public   | Admitting an animal into our care and/or recording a potential release site, checking and amending microchip details, logging incidents in our database at the National Call Centre, responding to concerns about an animal, updating witnesses of case outcomes and 'Home for Life' placements.   |
| Communicating and interacting with our supporters and members of the public   | Making supporters aware of our vital work caring for animals and the need for funds to support it, renewals of membership-based services, dealing with complaints, maintaining communication suppressions, facilitating awards based ceremonies, logging calls to our National Call Centre received from the general public relating to potential incidents and checking (and where necessary, updating) the microchip details for animals that have come into our care, sending you campaign emails and inviting you to events. |
| Undertaking research and analysis in order to better understand and communicate with our supporter base and to reach new supporters | Market research, surveys and data analysis in order to understand more about some of our current supporters.   |
| Administering and governing the charity   | Seeking professional advice and retaining data for historical, scientific or statistical purposes.   |
| Managing our operations   | Receiving information about job applicants and those applying for volunteer positions and administering supporters' estates and/or gifts in Wills where the RSPCA has been named as beneficiary or executor.   |
| Undertaking research on current and prospective supporters  | In order to understand our supporters better, we may undertake processing activities, including analysis, segmentation and prospect research, using publicly available sources and data tools, to customise the supporter experience. This may involve creating profiles of our individual supporters and we may sometimes use third parties to capture some of our data on our behalf. You can read more about <a href="#">making our work more unique to you</a> .   |

## How we keep your information safe

The RSPCA uses appropriate technical measures to ensure that we keep your information secure, accurate and up to date. For example, our online forms are encrypted and our network is protected and routinely monitored. Within our offices, only those individuals who are trained to handle data securely and who have a business need to access your information will be granted access. We have also put in place appropriate security measures to prevent your personal data from being altered, disclosed or accidentally lost or used or accessed in an unauthorised way.

If we engage a third party to act on our behalf, we undertake comprehensive checks in order to ensure that the contract sets out our expectations and requirements, particularly regarding access to the personal information they collect and how it is to be managed on our behalf. Organisations that work on our behalf are referred to as “data processors” which means that over and above the contract in place between us, they have legal obligations in relation to how your data is used.

Our website may contain links to third party websites. These websites have their own privacy policies and the RSPCA cannot accept any responsibility or liability for these policies. We strongly advise that you read the policies of these third party websites before you submit any personal data to them. You can find out more information about [our use of cookies](#).

Despite all precautions and appropriate security measures, the internet is not a 100% secure means by which to transmit information. We do our best to protect personal information but the RSPCA cannot guarantee the security of the personal data you share with us online and as such, any information you disclose is at your own risk. However, any payment card details (such as credit or debit cards) we receive on our website are passed securely to our payment processing provider according to the Payment Card Industry Security Standards.

## Persons at risk

We place great importance on the safety of persons at risk. On occasion, if we deem it to be necessary, we may record on our database that a supporter or service user is vulnerable or at risk. We do this to ensure that we are adequately protecting and supporting them in their engagement with the RSPCA, or complying with requirements under charity law and the Code of Fundraising Practice to ensure that we do not fundraise from them.

## Children’s personal information

We are committed to protecting the privacy of young people. Young people may engage with the RSPCA in a number of ways;

- they might want to fundraise for us;
- take out a Young RSPCA membership or join Animal Action Club;
- take part in educational events at schools; or
- enter our competitions such as our RSPCA Young Photographer Awards.

Our competitions and fundraising events may request specific information about the age of participants. Where appropriate, we will seek the consent from a parent, guardian or carer before collecting information about young people under 13. For young people aged between 13 and 17, we request that the individual inform their parents or other legal guardian before continuing with any service they wish to request from us. We aim to have clear, separate privacy notices for children so that they are able to understand what will happen to their personal data, and what rights they have.

## How long we keep your information

Whatever your relationship with us, we will only store your information for a specified amount of time as set out in our internal data retention policy, which takes into account relevant legal, accounting, regulatory retention requirements and operational considerations. The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that may apply to the information.

Where legacies are concerned, because legacy information is crucial to the valuable work that the RSPCA undertakes, we may keep data you provide to us indefinitely to carry out legacy administration and to communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive, and also enables us to defend contested legacies where it is appropriate to do so.

Once the retention period has expired, the information will be confidentially disposed of or permanently deleted. If you request no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future. When we anonymise or delete your data, we will ensure that it is no longer identifiable to you. We may keep anonymised data for future analysis on aggregated data so that we can understand our supporters better.

## Keep your information up to date

It is really important to us that the information we hold about you is accurate. You can help us keep our records up to date by telling us when your contact details and other personal information changes.

To make changes to the information we hold about you, please contact our Supporter Services team as follows:-

- call them on 0300 123 0346 (Monday to Friday, 9pm to 5pm);
- email them at [supportercare@rspca.org.uk](mailto:supportercare@rspca.org.uk); or
- write to RSPCA Supporter Services, RSPCA, Parkside Building, Chart Way, Horsham, RH12 1XH.

## Sharing your information with third parties

We safeguard the sharing of your information by entering into a contract, using formalised information sharing agreements where appropriate, or on an *ad hoc* basis after ensuring the request and disclosure are legally compliant.

We may share your personal information with the following third parties where we have a legal basis to do so:-

| Third party                    | Description  |
|--------------------------------|--|
| Our Branch network             | If you tell us you wish to become a Branch member we will share your contact details with your local RSPCA Branch, a separately registered, volunteer run charity, so they can get in touch with you about your Branch membership.   |
| Data Processors                | We use service providers, such as fundraising agencies, prospect research companies, direct mailing companies, mobile marketing providers, payment processors, market research companies and software platform providers to help us provide our services. For example, Capita is the data processor responsible for delivering our National Call Centre and Civica administers our annual meeting and elections. We may give relevant persons within these service providers access to your personal information, but only to allow them to perform their services for us. Some service providers may be based outside of the European Economic Area (EEA) however, we will endeavour to ensure that any data transfers outside of the EEA are carried out in compliance with relevant data protection legislation and that the processing of your data is subject to appropriate security measures. This may include engaging service providers that are accredited under the EU-US Privacy Shield, entering into EU approved model contracts or taking other steps to assess the adequacy of overseas suppliers. |
| PayPal / ApplePay              | To <a href="#">make an online donation</a> or payment by direct debit or payment card, you will be directed to a payment gateway which uses security features and encryption to ensure your data remains safe. We offer the use of PayPal and ApplePay for some of our products and services and have payment gateways operated on behalf of and under contract to us by other service providers, such as Revolut and Bottomline. Further information about the collection and use of your data will be provided on the relevant payment gateway for you.  |
| Disclosure and Barring Service | If you apply for a job with us, it may be a condition of your employment that we obtain a disclosure from the DBS.   |
| Partners                       | Our partners may include our Branches and other charities.   |
| AVID, Anibase or Petlog        | We try to make sure that all animals are microchipped when they are rehomed from us; this is a legal requirement in relation to dogs and horses. When you adopt an animal, we will share your personal   |

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|                                    |   |
|------------------------------------|---|
|                                    | information so that you can be contacted if your animal goes missing. We may also contact microchipping companies for the purpose of rehoming stray animals.  |
| HMRC / other regulators            | We may share your personal data with regulators for legal reasons, for example, we may share your data with HMRC for tax purposes.  |
| Professional advisors              | We seek third party support from lawyers, bankers, insurers, loss adjusters and auditors who provide legal, banking, insurance and audit, risk and compliance services.   |
| Pet Insurance providers            | If you rehome a cat or dog from us, we may also share your personal information with RSPCA Pet Insurance so they can offer you six weeks of free pet insurance. If you take this up, we will contact you with an offer to extend the cover after the free period ends. Our insurance is administered and underwritten by Covea Insurance plc, which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority.  |
| Government enforcement agencies    | When you call our cruelty helpline, depending on the nature of your concern, we may need to pass information to enforcement agencies such as Trading Standards, Animal Plant and Health Agency (APHA), the police, Social Services or to another animal welfare charity. We will only pass on your personal information where it is necessary for the purposes of investigating or resolving the concern that has been highlighted to us. We may also share information with the police for the prevention or detection of crime. |
| Press / media                      | When we conduct successful prosecutions, we may publish the identity of the defendant following conviction in press statements. We may also issue court alerts to local and national journalists who may wish to attend proceedings in order to report on them.   |
| Google Analytics                   | This service collects information about how visitors use our website and we use this information to promote campaigns online and to better understand our audience. This may include displaying advertising on websites you visit and using a feature called "remarketing" (displaying relevant adverts to people who have visited our website whilst they browse other sites).   |
| Marketing / segmentation providers | We may use third parties to assist us in optimising our website and the services we offer. We do this by sharing data which will be reviewed against lifestyle and demographic insights that will generate a report and enable us to tailor and target our communications.  |

## Exercising your privacy rights

You have the right to know what information we hold about you and to ask to see your records. We will supply any information you ask for that we hold about you as soon as possible, but this may take up to one calendar month (or potentially longer if it is a complex request). We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity.

To [request a copy of your data](#) please contact us.

### Right of access

You have the right to know what information we hold about you and to ask to see your records. We will supply any information you ask for that we hold about you as soon as possible, but this may take up to one calendar month (or potentially longer if it is a complex request). We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity.

To [request a copy of your data](#) please contact us.

### Right to be informed

You have the right to be informed about how your personal data is being/will be used. This notice, as well as any additional information or notice that is provided to you either at the time you gave us your details or otherwise, is intended to provide you with this information.

### 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 withdraw consent

Where we process your data on the basis of your consent you can withdraw that consent at any time.

### Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so. Please note that in some cases we may still have a legitimate reason to continue processing the data. You can read more about [our legitimate interests](#).

### Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database), also known as the right of erasure. Please note that there may be cases where we cannot delete all the data we hold about you, for example where we are processing it for legal purposes. In

addition, where you have requested that we do not send you marketing materials, we will need to keep some limited information in order to ensure that you are not contacted in the future.

### Right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To [update your records](#) please get in touch with us.

### Right to data portability

Where your personal data is processed on the basis of consent or as part of a contract we have with you, you have the right to request that the data is transferred from one service provider to another. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or [remove any information you think is inaccurate](#) by contacting us.

Please note the Freedom of Information Act (the 'FoIA') applies to public authorities and certain organisations that are listed in Schedule 1 of the FoIA. The RSPCA is not listed and thus has no formal obligations under the FoIA. However, we support transparency and will supply information where possible.



## Access your personal data or make a disclosure request

**Please note that due to the current circumstances and the need to prioritise essential services, our response to any information requests may take longer because of COVID-19 implications. The Information Commissioner's Office (ICO) has advised that although they are unable to extend statutory timescales, they have advised individuals that they may experience understandable delays when making requests during the COVID-19 pandemic.**

**Please be aware that even though the statutory rights of individuals under data protection legislation remain unchanged, our resources are now limited and they may be spread across various compliance tasks at this time, which will likely cause delays. We will keep requesters informed of any delays and will respond as soon as our resources allow. The same applies if you are an organisation making a disclosure request for personal data the RSPCA might hold. Please note that following government advice our offices are now closed, with our staff working from home. Therefore, we are currently unable to send any reports by post. We thank you for your understanding while working with the RSPCA during the pandemic.**

### Your information rights

You have certain personal data rights you can exercise in relation to the personal information we hold about you.

#### The right of access

This is also known as a Subject Access Request or SAR. This is your right to receive a copy of your personal information held by the RSPCA.

Please note that a SAR only allows you to see your own data and not anyone else's, for example, the person who reported you. Also, not all your personal data may be provided because the law allows for certain exemptions. We may ask for proof of identity when you submit your request. For more information, read our [Subject Access Request Guidance Notes](#).

#### The right to rectification

We want to make sure that your personal information is accurate and up to date. You may ask us to correct, update or remove any information you think is inaccurate. If you are a supporter or receive fundraising information, please email [supportercare@rspca.org.uk](mailto:supportercare@rspca.org.uk) or call them on 0300 123 0346.

For any other requests [please complete this form](#) and select 'rectification request' as the request type.

#### The right to erasure, or the "right to be forgotten"

You are entitled to have some personal data erased. However, this is a limited right and we may not be able to honour it all times. Please also note that we may require proof of identity of the person making the request.

To learn more, please see our [Right of Erasure Guidance Notes \(PDF 163KB\)](#).

## The right to object

You are entitled to object to the RSPCA processing your information in some circumstances, for example if you would like us to stop sending you marketing emails. We will comply unless we can demonstrate a legitimate reason not to.

## Rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision that is based solely on automated processing of a decision that affects your legal rights or other equally important matters.

Please email [supportercare@rspca.org.uk](mailto:supportercare@rspca.org.uk) or call them on 0300 123 0346 to receive more information or to voice your concerns.

This is not an exhaustive list - [check all your rights on the ICO website](#).

## How to send your data request

If you would like to make a Subject Access Request (SAR), an Erasure Request or a Rectification Request, [please complete this form](#). For any other queries, you can email us at [data.protection@rspca.org.uk](mailto:data.protection@rspca.org.uk).

## Third-party personal data requests

We want to assist the police, councils and other government or law agencies by sharing data wherever we legally can. Given that we are a private charity, we can only share personal information with such parties where a statute permits or orders us to. It is a common misconception that the information we process is in the public domain and can be made freely available.

As the data controller, we have a duty to ensure that any disclosure we make is both lawful and fair, as well as in accordance with the Data Protection Act 2018 (DPA) and the [ICO guidance on sharing data](#).

## How to make a disclosure request for information to the RSPCA

As the requester, it is your responsibility to make your case for disclosure, provide strong evidence and explain how the information we provide will support your case. There is usually no obligation on the RSPCA to disclose, so the more context you provide, the easier it will be to conclude that disclosure is necessary.

The following are examples of frequently used legal justifications we can consider. If unsure about the legal basis to support your request, please consult your own legal / data protection advisors.

## Rely on an exemption under the DPA

**Schedule 2, Paragraph 2 of the DPA (crime investigation/prosecution purposes or collection of tax/duty).** [Our Guidance Notes can help you structure your request \(PDF 132KB\)](#). You can also ask for statements from RSPCA staff in the same way. We kindly ask that police submit information on their force's own version of an NPCC approved form. Other agencies are also welcome to use their own forms, but you can use the [RSPCA Standard Disclosure Form \(PDF 191KB\)](#).

Please be advised that the RSPCA is not a party to and therefore, unfortunately, cannot rely on Child Protection / Welfare legislation. Furthermore, the RSPCA does not provide disclosure under **Schedule 2, Part 1, Section 5(3) of the DPA (necessary in connection with legal proceedings)**, as we are unable to carry out the impartial necessity test. It is for this reason that we cannot become involved in matters of a civil nature.

**Schedule 2, Part 1, Paragraph 5(2) of the DPA (required by an enactment, a rule of law or an order of a court or tribunal).** You can seek a court order, in which the necessity for disclosure can be assessed independently. Once served with it, we will respond by the set deadline. The type of Order we require in this instance must be explicit, in that the court must specifically order the RSPCA to disclose information to you and what this is exactly (in accordance with the Civil Procedure Rule 31.17).

## Cite a legal provision requiring the RSPCA to disclose

If you are relying on a certain section of a statute for your disclosure, please state this clearly. Additionally, please ensure that the legislation you rely on covers an entity like the RSPCA to permit / require disclosure of information to third parties. It is often assumed that the RSPCA is subject to most statutes and regulations when this is not the case.

## Ask for consent of the individual

In some cases, you may provide us with a written and explicit consent of the individual on whom information is sought. The consent should:

- Clearly state that the RSPCA is authorised to disclose information to you
- Include the printed name of the individual next to the signature and date signed
- Include the name of the third party to whom the RSPCA may disclose information.

You must ensure that the consent provided to the RSPCA is freely given, specific, informed and unambiguous. [The ICO provides more guidance on valid consent](#).

## How to submit your request

The RSPCA Data Protection Team at HQ deals with all disclosure requests.

- Email us at [data.protection@rspca.org.uk](mailto:data.protection@rspca.org.uk)
- Use CJSM secure email at [data.protection@rspca.cjsm.net](mailto:data.protection@rspca.cjsm.net)
- Write to us at the Data Protection Team, RSPCA, Parkside Building, Chart Way, Horsham, RH12 1XH.

We deal with queries in the order in which they were received. As a charity with limited resources and a high volume of requests, we ask and thank you in advance for your patience while we analyse your request.

If your enquiry is urgent, please state the nature of the urgency and what the deadline is - we can prioritise it then.

## How to contact us

### Requesting more information about this Notice

If you have any questions about our Privacy Notice you can email [data.protection@rspca.org.uk](mailto:data.protection@rspca.org.uk) or write to the Data Protection Team, RSPCA, Parkside Building, Chart Way, Horsham, RH12 1XH.

### How to make a complaint

Please tell us if you are not happy with how we have handled your personal information. For more information about our complaint process, please visit [How to Make a Complaint](#). You are also entitled to make a complaint to the [Fundraising Regulator](#) and the [Information Commissioner's Office](#).

### How to find out what information we have about you

You can request access to the personal data we hold about you. You also have a right to request a copy of that information and we will provide you with a copy unless legal exceptions apply. You can learn more about your rights and [how to exercise your right of access](#).

### How to change your marketing preferences

You can change any of your marketing preferences at any time by:-

- Unsubscribing from marketing emails by clicking the “unsubscribe” link at the end of our marketing emails;
- Contacting us through our Support Services Team by:-
  - calling them on 0300 123 0346 (Monday to Friday, 9pm to 5pm);
  - emailing them at [supportercare@rspca.org.uk](mailto:supportercare@rspca.org.uk); or
  - writing to RSPCA Supporter Services, RSPCA, Parkside Building, Chart Way, Horsham, RH12 1XH.
- Using [My RSPCA](#) - Login or register to manage your details and contact preferences;
- Entering your details on the [Fundraising Preference Service website](#) and choosing “Royal Society for the Prevention of Cruelty to Animals” by entering charity number 219099. You can read more about the FPS on its website but in short, this service is run by the Fundraising Regulator and enables you to stop email, telephone, postal communications and/or text message from a selected charity or charities. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

### How long will it take for these changes to be effective?

It may take up to 28 days of receipt of a request to discontinue sending marketing information because some of our appeals are done a few weeks in advance of mailing.

### Will I receive communications from you?

If you have indicated that you do not want to be contacted by the RSPCA for marketing purposes, we will maintain your details on a ‘suppression’ list to help ensure that we do not continue to contact you for marketing purposes, and we therefore comply with your request and you do not receive unwanted materials in the future. However, we may still need to contact you for administrative purposes, for example:-

- Processing any donation you make and any related Gift Aid;
- Providing you with information associated with an event or activity that you have signed up for (e.g. a campaign or sponsored marathon);
- To notify you of a security breach that may affect your personal data and to explain and apologise for any mistake that we may have inadvertently made.