



RBLI PRIVACY NOTICE

Introduction

This website is owned and managed by Royal British Legion Industries (RBLI). We are a charity registered in England and Wales under the charity registration number 210063. We are also a company limited by guarantee registered in England and Wales under company number 00158479. Our main trading address is Hall Road, Aylesford, Kent ME20 7NL.

We at RBLI take the privacy of our beneficiaries, customers, supporters and volunteers very seriously. We are strongly committed to protecting your privacy and every reasonable effort is taken to ensure that your information is kept secure and intact. This notice describes how RBLI collects and uses personal information about the people who visit our websites, online services and who give us their data over the phone, face-to-face, and in writing. This notice also states how and why we use data, how we store it and how individual personal preferences can be amended.

The terms of this notice may change, so please check it from time to time. This version published July 2022 supersedes all previous versions.

By using our website or using our services, you are accepting the practices described in this notice. If you have any queries about this notice, please contact:

The Data Protection Officer

RBLI
Hall Road
Aylesford
Kent ME20 7NL
E-Mail: dpo@rbli.co.uk

RBLI, as the Data Controller, is registered with the Office of the Information Commissioner under the Data Protection Act 2018, registration number Z6761919.

RBLI Privacy Statement

The UK General Data Protection Regulation (UK GDPR) provides the legal framework that defines how personal information can be used. RBLI is fully committed to complying with the principles set out in UK GDPR and has a legal duty to protect any information we collect from you. Please read this privacy notice to understand how we use your data.



We will only hold your personal information for as long as necessary for business purposes or if we are required to keep it by law.

Fundraising communication will be limited to a maximum of 72 months if we do not hear from you during this time.

Where you have provided your consent for us to send you marketing material the RBLI newsletter and regular updates via your preferred communication method. We will retain this information for 2 years after our last interaction.

If you make an enquiry to us, we will retain your data for 6 months following your enquiry unless you have asked us to keep it for longer.

For all other purposes, including when you make an online purchase, a donation, we will keep your information only for as long as we need it to provide you with the goods, services or information you have requested, to administer your relationship with us, to inform our research or the preferences of our supporters, to comply with the law and tax accounting rules, or to ensure that we do not communicate with people who have asked us not to.

When your information is no longer required, we will always dispose of it securely, in accordance with our Records Retention Policy.

Where data can be deleted sooner, we will do so, to ensure we only keep your data for the time that it is necessary.

Your personal information is only seen by those who need it to do their jobs. We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the UK GDPR

We will keep your information up to date. Inaccurate or misleading data will be corrected as soon as possible after being drawn to our attention.

Your information will be protected from unauthorised or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality. We will provide you with a copy of your personal information on request (please see below for information on access rights and requests).

These principles apply whether we hold your information on paper or in electronic form.

How do we collect information?



If you provide goods or services to RBLI, we will collect information in line with your contract for services.

Our websites and online services collect the information provided by you. We obtain personal information from you when you enquire about our activities – including fundraising and trading – when you register with us, send or receive an email, make a donation to us, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example from mailing list brokers.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

Information gathered this way will only be used by us to improve our online presence and offerings that we believe will be of use to our site visitors.

We will only ever collect the information that we need, including data that will be useful to help improve our services. The information is either needed to fulfil your request or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse our sites.

What information do we collect?

The personal information we collect might include name, date of birth, email address, postal address, telephone number and credit/debit card details.

We may also collect special categories of personal data such as information about your health if this is required for the purpose you have contacted RBLI. We collect special categories of personal data only if we are permitted to do so by data protection law, and we have additional measures in place to protect this data. This may include an individual's Regiment or Corps.

We also gather general non-personal information about the use of our website, such as which pages users visit most often, and which are of most interest. We may also track which pages users visit when they click on links in RBLI emails. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

Why do we collect this information?

We collect this information for the purpose of promoting the aims of the Charity and communicating effectively and appropriately with our supporters and, in particular, providing support to our beneficiaries. The lawful basis for which we process your



information can be one or more of the following, depending on the subject and context.

We rely on you providing your consent for us to send marketing material such as the RBLI newsletter and regular updates on fundraising or latest news via email, mail or phone. We also rely on your consent when you share your personal information with us on social media provided by you via your social network profile and the technical information you provide as managed by your browser settings.

When you make a purchase of an item, join an event or make a payment to support RBLI we require the information provided by you to fulfil the contract with you.

RBLI relies on legitimate interest for all other communications with you via our online platforms, including when you complete a comment, ask for more information, make an application to get involved with RBLI and if you apply to make use of the services provided by RBLI.

How do we use this information?

We will use the information you provide in the ways set out below:

- promote the aims of RBLI;
- to provide and personalise our services to beneficiaries;
- to communicate with our supporters, dealing with your enquiries and requests, recording any contact with you;
- to provide you with information that you have indicated an interest in, for example information about our campaigns, volunteering, fundraising and trading activities and how you can donate to us;
- we may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users;
- to claim Gift Aid on your donations;
- to conduct market research;
- Segmentation, so that we can offer supporters information relevant to them;
- for administrative purposes.

If you enter your contact details in one of our online event registration forms, we may use this information to contact you even if you don't "send" or "submit" the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.

Do we share your information with anybody else?

We may share your personal information with our suppliers, who we engage to process data on our behalf. In such cases information is only shared for the purpose of providing services on our behalf relating to communications, or agreements



between yourself and RBLI. Such processing is conducted under relevant Data Processing Agreements and means they cannot do anything with your information unless we have instructed them to do it

We also may need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

We do not sell personal details to other charities or other third parties.

Our websites may include links to websites run by other organisations. RBLI is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully before sharing any personal or financial data.

Storing and protecting your information

We recognise the concerns that many people have about providing personal information online. We place great importance on the security of all personally identifiable information associated with our beneficiaries, supporters, staff and volunteers. We have security measures in place to protect against the loss, misuse and alteration or destruction of personal data under our control. Information is stored by us on computers located in the UK. We may also store information on paper files. All of our online forms are protected by encryption. We also use a secure server when you make a donation or payment via our website.

Payment Card Information

RBLI does not store any sensitive payment card data in our systems. The Charity has an active PCI-DSS compliance programme in place. This is the international standard for safe card payment processes.

Transfer of Information Outside of the EU

We may share information with third parties for data processing that is outside the UK. Where this is the case we have contracts in place and ensure there are safeguards in place to protect your personal data.

By submitting your personal information, you agree to this transfer, storing or processing at a location outside the EEA.

Children

RBLI is concerned to protect the privacy of children (those aged under 18). We will seek consent from a parent or guardian before collecting personal information about a child. We will not knowingly request or collect from a child any information online that can be traced to the child, such as an email address, name, or information about the child's family. Unless a parent or guardian consents to such use in advance, we will not knowingly use information that a child provides to us for any fundraising or promotional purpose.



Your Rights

Our direct marketing is based on the email address that you provide to us, if you register multiple email addresses with us it is possible you may receive duplicate communications. We do have processes to minimise this. When exercising any of your rights it is recommended that you provide all email addresses that you have used to access RBLI products and or services.

You have several rights which allow you to choose and control how we use your data. These rights are explained below. If you would like to use these rights, please put your request in writing and send them to the postal address quoted above. Alternatively, you can send them to dpo@rbli.co.uk.

Transparency: You have the right to be informed about how we are using your data. If you think we are doing something with your information that we have not told you about in this Privacy Notice, you can object to this.

Access: You have the right to ask us what personal information we hold about you, and to request a copy, free of charge. Please note if we consider that the request is manifestly unfounded, excessive, or repetitive, we can charge a reasonable fee. This fee will be based on the administrative cost of providing the information.

Objection: You can object to the processing of your personal data. You should note that this right does not apply in all circumstances, for example, where we are processing information because it is necessary in the performance of a contract we will not be able to stop processing this information.

Withdrawal of consent: If we are processing your data based on your consent, you can withdraw this consent at any time. Where this is the case, we may no longer be able to provide the relevant service to you.

Rectification: If you think that the personal data we hold about you is inaccurate or incomplete, you have a right to request that it be rectified.

Erasure: You can ask us to delete your personal data where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have no lawful basis for keeping it.

Restriction: You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

Data portability: You can ask us to provide you, or a third party (if possible), with some of the personal data we hold about you in a structured, commonly used, electronic form, so that it can be easily transferred.



Appeal: If you are not satisfied with the way that we have dealt with your personal data, please let us know and we will try and resolve your concerns. You can make a formal complaint to dpo@rbli.co.uk.

If you are still not happy with our response, you have the right to appeal directly to the regulator – the **Information Commissioners' Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**. Visit: <https://ico.org.uk> or telephone: [0303 123 1113](tel:03031231113).

Cookie Usage

RBLI website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website. Cookies help us to provide you with a better experience by allowing us to understand what areas of the website are of interest to our visitors (e.g. via Google analytics).

Our cookies aren't used to identify you personally. They collect anonymous information on the pages visited and we do not use advertising cookies. Most browsers will allow you to turn off cookies. Please note however that turning off cookies can and may restrict your use of our website. To learn more about cookies and how to manage them, visit AboutCookies.org

When you first visit our site, you are given the option to opt-out of cookies but please be aware that this may negatively impact on your ability to view and use content on our website.

Trademarks and copyright

RBLI website contains material which is protected by copyright and/or other intellectual property rights. All copyright and intellectual property rights including the names, images and logos are owned by RBLI unless otherwise stated. All rights are reserved.

You are responsible for complying with all applicable copyright laws. We permit you to make copies of information on RBLI website as necessary incidental acts during your viewing and you may take a print for your personal use of so much of the site as is reasonable for private purposes. All other uses are prohibited. Nothing in these terms shall be construed as conferring any right to use any trademark, logo, patent right or copyright of RBLI.

Royal British Legion Industries Ltd uses the two petal Poppy Logo under licence from The Royal British Legion.

Changes



We may change the terms of this privacy statement on occasion. If we do so, we will post the changes here, so please check from time to time and include in our communications that this document has been updated. We will also keep prior versions of this Privacy Notice in an archive. By continuing to use our websites you will be deemed to have accepted such changes.

If you have any questions about this notice or how we use data please contact the Data Protection Officer at the above address or via email to dpo@rbli.co.uk.

Data Protection Regulator

Further information and advice about data protection is available from:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: +44 (0) 01625 545 745

Website: www.ico.org.uk

Fundraising Preference Service

RBLI is committed to empowering our supporters to manage their information. The Fundraising Preference Service (FPS) enables donors to take control of their charitable giving and conversations; and we want to help you use the service effectively.

RBLI supports the Fundraising Regulator and its efforts to develop the Fundraising Preference Service as a means of rebuilding trust between charities and the public. The Charity is committed to upholding fundraising best practice and being as transparent as possible with our donors.

This notice will be reviewed regularly. Any queries regarding this notice, or comments, should be addressed to the Data Protection Officer.