



## DATA PROCESSING STATEMENT

The Trustees of the Cameron Fund are aware of the need to process personal data for a legitimate and lawful purpose and set out below how personal data is processed, stored and retained. Read this statement to understand:

- The type of data that we collect about you
- The purpose of the data that we collect about you
- The legal bases/justification for processing your data
- Our legitimate interests in your data
- The consequences of your failing to provide data that we request
- Extended processing of your information
- How we may share or transfer your data
- What happens when we transfer your data outside the European Economic Area
- Our data retention policy
- Data security
- Your rights
- Future changes to this statement

### 1. THE TYPE OF THE DATA THAT WE COLLECT ABOUT YOU

#### **Applicants and Beneficiaries**

We collect information you provide including personal details and other data relating to your work, finances and relationships when you complete our [Application Form](#). We also collect information about the ethnicity of potential applicants and beneficiaries via our [Ethnic Monitoring Form](#), which remains anonymous and does not include personal data.

#### **Individual Donors**

We collect information you provide, such as your name, your signature, email address and postal address when you make a single donation to us, complete our [Standing Order Form](#) to give a regular donation or make a [Gift Aid Declaration](#).

#### **Members**

We collect information you provide, such as your name, date of birth, email address and postal address when you complete our Membership Form.

#### **General**

We collect information about your use of our website including your IP address, how much time you spend on our website and what you view. We use [Cookies](#) to help us identify which web pages are accessed by you.

### 2. THE PURPOSE OF THE DATA THAT WE COLLECT ABOUT YOU

#### **Applicants and Beneficiaries**

We use your personal data to understand the circumstances that led you to contact the Cameron Fund. We use your banking details to process financial transactions. We use your personal data to help us identify you when you contact us and to help us properly maintain our records.



### **Individual Donors**

We use your contact information to send you e-newsletters and bulletins if you have opted in to receive mailings from us. We also use your banking details and contact details to process donations you have made to us and to send you an acknowledgement for such donations. We also use your personal details to claim Gift Aid. We use your personal data to help us identify you when you contact us and to help us properly maintain our records.

### **Members**

We use your contact information to send you e-newsletters and bulletins. We use your details to send you notice of meetings, notice of resolutions to be passed, notice of your right to vote or appoint a proxy to vote on your behalf at meetings, minutes of Annual General Meetings and General Meetings and to send you copies of our Trustees' Annual Report Financial Statements. We use your personal data to help us identify you when you contact us and to help us properly maintain our records.

### **General**

We will use your personal details to inform you about changes to this policy.

## **3. THE LEGAL BASES & JUSTIFICATION FOR PROCESSING YOUR DATA**

### **Applicants and Beneficiaries**

We only process your data with your consent and as a necessary part of the application process. We also process your personal data to ensure that in instances where you are in receipt of state benefits the assistance we provide takes these into account. We also process your personal details to protect your interests in instances where your enhanced data is required to respond to your circumstances appropriately. In circumstances where we consider there is a serious risk to patient safety or where we believe you may be vulnerable or susceptible to abuse, we reserve the right to provide your personal data to the appropriate authority.

### **Individual Donors**

We process your personal data for donations once we receive your signed consent to do so and to communicate with your bank where a Standing Order Form has been completed. We also process your personal data to meet our legal obligations such as sending Gift Aid data to HM Revenue & Customs.

### **Members**

We process your personal data to comply with the legal obligations and rights of members as contained in the Companies Act 2006.

## **4. OUR LEGITIMATE INTERESTS IN YOUR DATA**

We process your personal data because without doing so, we would be unable to fulfill our charitable activities and function as a business entity. As part of our annual risk assessment we review the impact of our processes on your privacy.

## **5. THE CONSEQUENCES OF YOUR FAILING TO PROVIDE DATA THAT WE REQUEST**

You are not required to provide your personal data to us. However your failure to do so may affect our ability to provide the services that you require. We are unable to receive a donation from you if you do not provide your banking information. We are also unable to process financial transactions for beneficiaries without your banking information.



## **6. EXTENDED PROCESSING OF YOUR INFORMATION**

Your personal data is used for internal reporting and summary analysis.

## **7. HOW WE MAY SHARE OR TRANSFER YOUR DATA**

### **Applicants and Beneficiaries**

We may disclose your data to other medical benevolent charities with whom we have Data Sharing Agreements and in order to better understand your circumstances and, possibly, refer you to another medical benevolent charity which may be better placed to assist you.

We may request further information regarding your situation from your referees, your doctor, your medical school, the organisation providing you with training, the LMC and/or other charities to which you have applied.

In some cases and with your consent, we share your personal data with our Money Advisor and Career Coach to provide expert advice on how to better manage your financial situation or your future employment.

We may also disclose your personal data to statutory or regulatory bodies and legal advisors or to protect our legal rights, eg. taking a charge on your property.

Your personal data will be accessed and used by our Trustees, staff and volunteers who have all signed a non-disclosure agreement.

### **General**

We will never sell, rent or trade your personal data for the purposes of marketing.

## **8. WHAT HAPPENS WHEN WE TRANSFER YOUR DATA OUTSIDE THE EEA**

Some of our service providers, eg. Google, operate outside the European Economic Area. Therefore, sometimes your data may be transferred outside the EEA. If we do so, we ensure your data is processed only in countries that provide an adequate level of protection for your data or where the service provider demonstrates appropriate safeguards such as model contract clauses and binding corporate rules.

## **9. OUR DATA RETENTION POLICY**

We keep your data for as long as we consider that it is legitimately needed.

For donors, we keep data on Gift Aid Declarations for six years after the end of the accounting period to which the first or only donation relates. If you are continuing donor, we will ask you to complete a new Gift Aid Declaration every six years.

For beneficiaries who have received support, we retain summary information about them and all other data is deleted after six years.

If your application to us is not successful, we retain your data for three years in case you make a second or further application in that time. In exceptional cases, the Trustees reserve the right to keep your data on file for longer periods.

## **10. DATA SECURITY**

When, under Data Sharing Agreements, we share your data, we ensure personal data is transferred securely and safely.



The Cameron Fund uses an extranet to process and store documents containing personal data including application forms. Trustees and staff access this extranet to upload and download documents containing personal data. The extranet is securely maintained. The Cameron Fund has a separate [Data Protection Policy](#) which covers the use of personal devices and how data in general, including personal data, is stored and transported.

## 11. DATA SUBJECT RIGHTS

These are the rights of beneficiaries, individual donors, Members and general visitors to the Cameron Fund's website.

- Right of Access / Subject Access Rights: You have the right for us to tell you if we have your data and give you a copy of the data we hold about you (on request).
- Right to Rectify: You have the right to correct the data we hold about you.
- Right to Erasure: You have the right to ask us to delete the data we hold about you. Note that for legal reasons, we may decline to fulfil this request.
- Right to Restrict Processing: You have the right to stop us from processing your data but not to delete it. Please be aware that we may not be able to fulfill our obligations to you if you restrict us from processing your data.
- Right to Portability: You have the right to request data we hold about you in a common machine readable format.
- Right to Object: You have the right to opt-out of direct marketing communications; to object to processing your data for scientific and historical research or statistics; to object to us processing your personal data based on our legitimate interests if you think such interests are not legitimate.
- Right to Withdraw Consent: You have the right to withdraw consent to receive direct marketing communications.
- Right to Complain to the Information Commissioner's Office (ICO): You have the right to complain to the ICO about how we managed your personal data. The Cameron Fund is registered with the ICO – no. Z4661076.

## 12. REQUEST FOR INFORMATION

If you wish to see information that we hold about you, we will respond to a written request with evidence of identification within thirty days of receipt by providing paper copies of all documents. A copy of information will normally be provided free of charge except where the request is manifestly unfounded, excessive or a duplication of previous requests. We reserve the right to refuse to respond.

## 13. STATEMENT UPDATES

[The latest version of this statement will be available on our website.](#)

## 14. VERSION CONTROL

*This is the most recent version of the privacy policy and is dated 16 February 2018.*