

# Auto Immune and Multiple Sclerosis (AIMS) Privacy Notice

## **Revision History**

Version	<b>Revision Date</b>	Revised by	Section Revised
1.3	14/05/2019	DPO	All
1.4	04/09/2019	DPO	All
2.0	03/09/2020	DPO	Annual Revision
2.1	20/01/2021	DPO	GDPR Audit

## Document Control

Document Owner:	Document No:	<i>Status:</i>	Date Approved:
AIMS	AIMS003	Approved	03/09/2020
<b>Security Classification:</b>	Next Review Date:	Version:	Department:
Low	02/09/2021	V2.0	



# Who We Are

Auto Immune and Multiple Sclerosis ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Our registered office is at **13 Hattersley House**, **1 Hattersley Court**, **Ormskirk**, **L39 2AY** and we are a **charity registered in England and Wales under charity number 1177907**. We are registered on the **Information Commissioner's Office Register; registration number ZA497848**, and act as the data controller when processing your data. Our designated Data Protection Officer/Appointed Person can be contacted at 13 Hattersley House, **1** Hattersley Court, Ormskirk, L39 2AY or on <u>dpo@aimscharity.org</u>.

## **Information That We Collect**

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### The personal data that we collect from is: -

- Name
- Phone
- Email
- Address
- Medical Condition
- Date Of Diagnosis
- EDSS
- HSCT Facility
- HC2 Certificate Held
- HC2 Eligibility
- Confirmed Date
- Acceptance Letter
- Full Funds Secured
- Mode Of Travel
- Personal Journey
- Other Funding
- Flight Booked
- Flight Cost
- Train Journey
- Taxi Journey
- Car Journey



- Amount Requested
- Declaration
- Signature

#### We collect information in the below ways: -

Online forms, social media, chat functions and email requests.

#### How We Use Your Personal Data

We take your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

## Your Rights

You have the right to access any personal information that we process about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing



from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

# **Safeguarding Measures**

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, *including:* -

SSL, access controls, password policy, encryptions, practices, restriction, IT and authentication, firewalls, anti-virus and malware.

# Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

Auto Immune and Multiple Sclerosis (AIMS) utilise some products or services (*or parts of them*) that may be hosted/stored in **non-EU countries**, which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA") for the below purposes: -

website hosting, email servers, marketing database (i.e. MailChimp, Ecommerce, Email Server, Digital/cloud storage)

Therefore, when you [use our website/send us an email/sign up to our newsletter etc], the personal information you submit may be stored on servers which are hosted in non-EU countries. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by Auto Immune and Multiple Sclerosis (AIMS to protect your data and comply with the relevant data protection laws.

## Legitimate Interests



As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing emails, newsletters and surveys that we think you will be interested in, based on legitimate interest and have identified that our interests are beneficial and relevant to our customers and in our interests.

# How Long We Keep Your Data

Auto Immune and Multiple Sclerosis (AIMS) only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## **Special Categories Data**

Owing to the products, services or treatments that we offer, Auto Immune and Multiple Sclerosis (AIMS) sometimes needs to process sensitive personal information (*known as special category data*) about you, to ensure that we have accurate and up to date health or medical information when working with or for us. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent either by email, telephone and or signature on request my mail. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

If you consent to us collecting and using your health/medical details under legal basis and consent for the purposes stated above, please sign below and print your name: -

Signature	

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_



## Marketing CONSENT

Occasionally, Auto Immune and Multiple Sclerosis would like to contact you with the services that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting Auto Immune and Multiple Sclerosis directly.

If you *consent* to us contacting you with the above-mentioned marketing and offers, please tick to say how you would like to be contacted: -

Post 🗌 Email 🗌 Telephone 🗌 Text Message (SMS) 🗌

## LEGITIMATE INTERESTS EXAMPLE

Auto Immune and Multiple Sclerosis will occasionally send you services and information related to Auto Immune diseases and Multiple Sclerosis by email, SMS or post that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

If you would prefer not to receive above-mentioned marketing and offers, please tick below: -

I wish to opt-out of marketing  $\Box$ 

## Lodging A Complaint

Auto Immune and Multiple Sclerosis only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Auto Immune and Multiple Sclerosis (AIMS) 13 Hattersley House, 1 Hattersley Court, Ormskirk, L39 2AY info@aimscharity.org

Supervisory Authority Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### https://ico.org.uk/make-a-complaint/

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number