

# The Royal Naval Benevolent Trust

## Privacy Policy

### Who we are

The Royal Naval Benevolent Trust (RNBT) (Registered Charity 206243 & Scotland SC052748) provides financial assistance and support to Royal Naval ratings, Royal Marines other ranks and their families, in times of need.

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

If you have any questions regarding our Privacy Policy, please write to:

The Data Protection Officer  
The Royal Naval Benevolent Trust  
Castaway House  
311 Twyford Avenue  
Portsmouth  
PO2 8RN  
Email: [dpo@rnbt.org.uk](mailto:dpo@rnbt.org.uk)

### What we do

RNBT has been helping naval personnel and their families since 1922. We help our beneficiaries in the following ways:

- Grants to individuals to assist in a wide range of circumstances
- Regular Charitable Payments to those on especially low incomes
- Provision of welfare advice and signposting to other agencies
- Caring for older people at our care homes in Gillingham, Kent and in Portsmouth, Hampshire
- Almshouse in Hornchurch, Essex

### Data Protection

RNBT will never exchange or sell your information to another organisation for its own marketing purposes. We know that this is important to you and want to reassure you that you're always in control of how we use your personal information in regard to any marketing and fundraising activities.

We do however need to collect and use your personal information for carefully considered and legitimate business purposes, which help to ensure we can run RNBT efficiently, raise funds effectively and deliver our charitable services. This policy sets out how your personal data will be used, what data we collect, our legal basis for its use, along with outlining your rights in respect of personal data.

### Purposes

In simple terms, your personal information may be used to help us effectively deliver our charitable activities or to help us raise funds for those charitable activities.

We always strive to provide a clear, honest and transparent approach regarding how and when we may collect and use your personal data. The overview below summarises the different reasons why we do this. We may not use your personal information for all of these purposes – it will depend on the nature of our relationship with you, and how you interact with our services, website, and fundraising activities.

Purpose	Examples of Common Activities & Data Collected
1. Provision of financial assistance and welfare advice	To assess applications for financial assistance we will require the collection of beneficiaries' personal information including contact details, spouse and dependant details, service history, financial information, health and social circumstances, levels of satisfaction and assessment of outcomes.
2. Caring for older people in Pembroke House, Admiral Jellicoe House and JCVCNM Almshouse	To assess applications for admission to our care home and almshouse and to provide appropriate care for residents of Pembroke House and Admiral Jellicoe House, we will need to collect personal information including contact details, service history, next of kin, power of attorney, medical information, financial information and care needs, levels of satisfaction and assessment of outcomes.
3. Management of Volunteers	Our volunteers include Trustees, and volunteers at Pembroke House and Admiral Jellicoe House. We need to use your personal information to assess applicants, manage volunteering activities, apply for DBS checks and reimburse expenses.
4. Income generation	For our donors and supporters who purchase our merchandise or attend our fundraising events we may collect personal information including contact details and, where applicable, information for the claiming of Gift Aid.
5. Staff Administration	In order to deliver our charitable services we employ a range of staff at our Head Office and at our care homes. We process the personal information of our employees for recruitment, staff administration, remuneration, pensions, employee benefits and appraisal purposes.

### Lawful Basis for Processing

RNBT needs a lawful basis to collect and use your personal data. RNBT processes personal data under the following lawful bases:

- Information is processed on the basis of a person's consent
- Information is processed on the basis of a contractual relationship
- Information is processed on the basis of the legitimate interests of RNBT
- Information is processed on the basis of a person's vital interests

#### Consent

If you apply for financial assistance, RNBT will ask for your consent to process your personal information. If you complete a donation form, we will ask for your consent to keep in touch with you in the future. You can withdraw your consent at any time by contacting us.

#### Contractual Relationships

If you are a resident at our care home or almshouse we will have a contractual relationship with you which will require the processing of certain personal information. If you are an employee, the processing of your personal information will be necessary for the performance of your employment contract.

#### Legitimate Interests

The law allows personal data to be legally collected and used if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned. Examples of RNBT's legitimate interests would include:

- Delivery of our charitable purpose as set out in our Royal Charter
- Reporting criminal acts and compliance with law enforcement agencies
- External audit for financial or regulatory compliance purposes
- Statutory reporting
- Processing of financial transactions and maintaining financial controls
- Contacting the Ministry of Defence or its agencies to confirm service details
- Enforcement of legal claims including debt collection via out-of-court procedures
- Administration of supporters' gifts in Wills where RNBT has been named as a beneficiary
- Communications designed to administer medical services for a resident at our care homes e.g. appointments, consultations, care plans, medication, or debt recovery
- Thank you communications and receipts
- Publicising our charitable activities e.g. media, social media and website posts

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.



## **Vital Interests**

We may need to process personal data where it is in your vital interests to do so. This is likely to be in rare situations such as where a resident, volunteer or employee requires emergency medical care and we are unable to gain consent in advance.

## **Do we process 'sensitive' personal information?**

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race, religious beliefs, and political opinions ('sensitive personal data'). We may collect sensitive personal data about you. For example we will collect details of religious beliefs for applicants for financial assistance to determine if there are faith based charities who may help provide assistance. We will collect information on race for employees for equal opportunities monitoring. We will collect health information for our Care Home residents to provide appropriate care. We would only collect sensitive personal data if there is a clear reason for doing so

## **How do we protect your data?**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection and cyber awareness training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

If you use your credit or debit card to donate to us, or buy something online, we pass your card details securely to our payment-processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard and don't store the details on our website or databases.

We currently operate CCTV at Castaway House and Pembroke House and you may be recorded when you visit them. CCTV is there to help provide security and to protect staff, residents and visitors to RNBT. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

RNBT complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

## **Where does the information come from?**

The majority of personal data we hold is given to us directly by our beneficiaries, residents, supporters, volunteers and employees. For applicants for financial assistance, this will usually be collected from a caseworking organisation (mainly SSAFA and The Royal British Legion) through the Form A and supporting documents as well as information provided direct via the Lightning Reach on-line portal. For our Care Home residents, this will be through the Resident Application Form and our day to day care; for employees this will be through Application Forms, the recruitment process and ongoing employment; for Volunteers, this will be through applications to volunteer with us and other supporting documents such as DBS checks. For donors, this will be through the donation or direct debit forms. We may also receive your personal information when you donate to RNBT through third party services such as Virgin Money Giving.

## **Data Retention**

We only retain your personal data for as long as we need it to fulfil our charitable activities or where the retention period is governed by statutory, regulatory or contractual (e.g. insurance) rules. For our Care Home residents, we follow the Department of Health's Code of Practice for health care records management. This means that for most residents we will keep their records for 8 years after they no longer live at the Home. Some resident records are kept for 50 years to comply with insurance requirements. Personal records which form part of the accounting records will be kept for 7 years. Personal records of unsuccessful job applicants will be held for 6 months.

We will destroy personal data after the data retention period in a secure manner.

## **Data Sharing**

RNBT will never exchange or sell your personal information to another organisation for its own marketing purposes.

There are legitimate situations where we may have to share your personal information with other organisations. If you apply to us for financial assistance we may share your personal information with other organisations which may be able to help you (for example another benevolent charity which you are eligible to receive assistance from). We occasionally use cases where we have assisted a beneficiary to promote the work RNBT does in publicity materials or to share with grant-making organisations. We would always obtain the consent of the person concerned before using someone's personal information in this way. For residents of our care homes, we may need to share information with other medical professionals. We may also need to share

information with the Ministry of Defence to confirm service records. For donors, we may share personal information with HMRC for the purposes of reclaiming Gift Aid. For employees, we may need to share personal information with our pension provider and other employee benefit providers. We may also need to share employees' personal information with the Disclosure and Barring Service (DBS), HMRC, Department for Work and Pensions and our auditors. For Trustees, we have to share personal information, such as name, address and date of birth with the Disclosure and Barring Service (DBS) and the Charity Commission.

We sometimes publicise our charitable activities through our website, media, social media and print materials; this may include photographic images and names of employees, volunteers and beneficiaries. We will not share images and names where the rights or interests of the individuals would be adversely affected.

### **When it comes to my personal data, what are my rights?**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our Data Protection Officer at RNBT, Castaway House, 311 Twyford Avenue, Portsmouth, Hampshire PO2 8RN or email [dpo@rnbt.org.uk](mailto:dpo@rnbt.org.uk).

We can provide you with a template subject access form which includes guidance on how to make your request (and will help us respond more quickly). Please contact us for a copy of this.

### **Marketing Preferences**

RNBT does not generally engage in sending marketing communications to our supporters. If we decide to in the future, we will only send you communications that are appropriate and relevant to you. You are in control of how we use your personal information for marketing and fundraising purposes. Simply call our head office on 02392 690112 and they can update your communication preferences.

### **Transfer of Information Outside of the EU**

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and we will take steps to ensure they provide an adequate level of protection in accordance with the UK's Data Protection Act. By submitting your personal information you agree to this transfer, storing or processing at a location outside the EEA.

### **Under 16s**

RNBT is committed to protecting the privacy of children aged under 16. Where appropriate, we will seek consent from a parent or guardian before collecting personal information about a child aged under 16.

### **Collection of Data through 'Cookies'**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. For information on how we collect data through cookies, see our Cookies policy.

### **Notification of changes to this privacy policy**

This Privacy Policy may change from time-to-time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up-to-date with the changes to our Privacy Policy.

### **What to do if you are not happy?**

In the first instance, please talk to us directly so we can help resolve any problem or query. Please contact our data protection officer using this email address: [dpo@rnbt.org.uk](mailto:dpo@rnbt.org.uk).

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at [www.fundraisingpreference.org.uk](http://www.fundraisingpreference.org.uk) or by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk).