

# **Privacy Notice**

#### AMR Action UK

At AMR Action UK, we're committed to protecting and respecting your privacy. This notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this notice and our privacy practices should be sent by email info@amr-action-uk.org or write to AMR Action UK, 167-169 Great Portland Street-5th Floor, London,

W1W 5PF. Alternatively, you can telephone 07549 020999.

### Who does this notice apply to?

This notice applies to individuals whose personal data is processed by AMR Action UK.

#### Who are we?

Drug resistant infections, generally known as AMR, are a massive and growing problem in the UK, but with little public awareness of the devastating impact they have on the lives of those affected. AMR Action UK is an organisation that works to raise awareness of issues that impact patients, families and communities affected by AMR and to support patients.

In this Privacy Notice 'AMR action UK', we', 'us' or 'our' means: AMR Action UK. Registered Charity No. 1157884

Usually, AMR Action UK will be the 'controller' of your personal information. This means that we are responsible for deciding how your personal information is used and ensuring that it is used in compliance with applicable data protection law (in conjunction with other parties, where applicable).

#### How do we collect information?

#### **Directly**

For example, we may obtain information about you:

- If you contact our Patient Support and Information Service
- Participate in our patient panels and peer support groups
- Are involved in our research activity
- If you choose to participate in a fundraising event
- By donating

- By giving a regular gift
- By pledging a legacy
- By volunteering

### **Mandatory information**

In some circumstances, it may be mandatory to collect and process some of your personal details to deliver the service or provide the support you are looking for.

## For example:

- If you donate to us, we need to ask for your name, card details and full address
- If you allow us to claim Gift Aid we will need to ask for additional information
- We need your contact details to respond to your enquiry or complaint
- If you participate in an Event, we may need to hold information about you

### Information given indirectly

Your information may be shared with us by third parties, for example where you have consented for them to do so or where there is an agreement/contract in place between us and the third party. These might include:

- Through referrals from other organisations such as JustGiving or Facebook
- Information we may receive from independent event organisers
- Information on pledges and legacies through solicitors
- Supporter recruitment companies
- Subcontractors acting on our behalf
- Technical payment providers

### When you visit our website

We, like many organisations, automatically collect the following information:

Technical information, including the type of device you're using, the IP address, browser and operating system being used to connect your computer to the internet. This information may be used to improve the services we offer.

Information about your visit to our website, for example we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, products and services you viewed and searched for, referral sources (e.g. how you arrived at our website).

We collect and use your personal information by using cookies on our website. More information on cookies can be found under the 'Use of Cookies' section below.

## When you use social media

When you interact with us on social media platforms such as Facebook, Instagram and Twitter we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have

set on those types of platforms. If you interact with us in this way, we encourage you to read the Privacy Notice of the social media platform(s) you use.

As mentioned above, we collect and use your personal information by using cookies, including social media cookies (i.e. third-party cookies). We use social media cookies to enhance the functionality of our website and provide you with personalised content (see 'Use of Cookies' below for more information).

## What type of information do we collect?

The information we collect, store and use from you may depend on the relationship you have with AMR Action UK. This might include:

- Your name and contact details (including postal address, email address and telephone number)
- Your date of birth
- Your communications with us, such as call recordings and emails you send. These communications may relate to general enquiries, requests for support or guidance, and complaints or feedback about our activities, products and services.
- Your bank or credit card details. If you donate online, your card information is not held by us, it is collected by our third-party payment processors, who provide secure online capture and processing of credit/debit card transactions.
- Information as to whether you are a UK taxpayer so we can claim gift aid
- If you are a successful applicant to volunteer or work for us, we will ask for
  photographic ID to verify your identity. We may also collect your National Insurance
  number and information from the Disclosure and Barring Service (DBS) where
  appropriate.
- Data protection laws recognise certain categories of personal information as sensitive and therefore require greater protection, for example information about your health, ethnicity and religion.
- We do not usually collect sensitive data about you unless there is a clear and valid reason for doing so and data protection laws allow us to.
- Where appropriate, we will make clear why we are collecting this type of information and what it will be used for.

# How and why is your information used?

The purposes for which we use your information may depend on the relationship you have with AMR Action UK. We may use your information for different purposes, which may include:

- providing you with the services, support or information you asked for.
- carrying out our obligations under any contracts entered between you and us.
- keeping a record of your relationship with us.
- administering your donations, including processing Gift Aid.
- responding to or fulfilling any requests, complaints or queries you make to us.

- seeking your views or comments on the services we provide.
- notifying you of changes to our services.
- sending you communications which you have requested and that may be of interest to you. These may include information about campaigns, fundraising appeals and activities and promotions of goods and services.
- communicating with you about the fundraising events you have signed up for to help us raise important funds for our charitable work.
- checking donations for the purposes of prevention of fraud or other crime.
- processing grant, volunteer or job applications.

# How and when will you hear from us?

### **Support Services**

We will only use your contact details as provided and consented to when using our support services. This may be to send you information as requested or to return a call to you related to the support you have received.

# **Fundraising Marketing Communications**

We may use your contact details to provide you with information about the vital work we do, our fundraising appeals and opportunities to support us.

# Email, text, post and phone

We will only send you marketing and fundraising communications by email, text, post and telephone if you have explicitly provided your prior consent. This does not apply to service communications (see below).

We'll always ask for your permission to contact you about our activity and services in this way, for example:

- when you donate
- if you have signed up for one of our fundraising or campaigning events

You can opt out of our marketing communications at any time. Please see "Your Choices" for further information.

#### Service communications

We may send you certain forms of communication, without your consent, if we are under a legal obligation to do so; if we feel sending the communication is in both yours and our interests; and/or it would be a disadvantage to you if we didn't send you communication. These communications may include:

- 'Thank you' emails for confirming receipt of your kind donations made to us
- Registration confirmation, when you sign up for one of our events
- Changes to our services

#### Social Media

We advertise on Facebook, Twitter and Google as well as some other online platforms such as Instagram. We also place adverts on other websites to promote general awareness of AMR Action UK for fundraising and services that we offer. We do this by:

- 1. Advertising on particular types of websites for example newspapers and magazines' websites.
- 2. Advertising to people who sign up with an online platform (such as Facebook or Google) based on what the platform knows about them.

We may use the following re-marketing processes on some or all specific online platforms.

- 1. 'Look-alike' / 'Similar' audiences: We send a list of 'hashed' email addresses to an online platform such as Facebook or Google (hashing is a security measure whereby the personal information is turned into a code).
- 2. 'Custom audiences'/ 'Customer matches': We use a similar method as above to send information and support about our fundraising campaigns/ marketing campaigns to people who have already signed up for these.
- 3. 'Saved' audiences to remember which supporters on Facebook are most likely to respond to our fundraising, campaigning, and marketing requests.
- Tracking people's interactions with our adverts so that we know when an individual has clicked on an advert. This allows us to measure the effectiveness of our campaigns.

In some of the above instances, this means that if you have already visited our website, we can direct you back to it through ads shown on sites you visit across the internet by third party vendors. These third-party vendors include Google and Facebook. All parties may use cookies to serve these ads based on your past visits to our website.

You can object to your information being used by declining cookies when you visit our site.

# **Philanthropy**

We sometimes research and profile potential or existing high-value donors. This helps us identify and engage with people who may wish to support us, ensuring our fundraising requests are appropriate and tailored. This allows us to use our resources more efficiently. If you would prefer us not to do this, please contact us.

#### **Profiling and Analysis**

We may use your personal information to better understand your interests and preferences. This helps us send communications that are more timely and relevant, and it reduces the chance of you receiving information that isn't useful to you. Where available, we may also use information from external sources to improve the accuracy of our profiling.

You are always in control of your data and can opt out of this type of use at any time by contacting us. We may also use your information to help detect and reduce fraud or credit risk.

## Who has access to your information?

We do not sell or rent your information to third parties and we do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties to achieve the other purposes set out in this notice. These third-party relationships may include:

Third-party service providers, suppliers, agents, subcontractors, and other associated organisations for the purpose of completing tasks and providing services to you on our behalf (for example to process donations and send you communications). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services, and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use, unless you have requested us to do so, or we are required to do so by law, for example, by court order or for the purpose of prevention of fraud or other crime.

# **Organisational Changes**

If we merge with another charity or transfer our activities to another organisation, we may share or transfer personal information where necessary for that process. Any organisation receiving your information will be required to use it only for compatible charitable purposes and to protect it in accordance with data protection law.

#### **Lawful Processing**

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

## **Specific Consent**

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text, post and/or telephone marketing. Your specific consent is also used where you have agreed for us to use your personal information in case studies to promote our work.

### Performance of a contract

Where we are entering into a contract with you or performing our obligations under it, for example when you buy our products, attend a conference or participate in events.

# **Legal Obligation**

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator.

#### Vital Interests

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the appropriate statutory authority or service.

# **Legitimate Interests and Safeguarding**

We consider our legitimate interests to be running AMR Action UK as a charitable organisation in pursuit of our aims and ideals. For example, to:

- 1. Send email messages about, and related to, fundraising events you have signed up for to help you raise important funds for our charitable work.
- 2. To understand how people choose/use our services or attend events.
- 3. To determine the effectiveness of our services, promotional campaigns and advertising.
- 4. Sharing personal data amongst relevant teams within AMR Action UK to ensure we communicate with our supporters in the most effective way.
- 5. Monitor who we deal with to protect the charity against fraud, money laundering and other risks.
- 6. Record and monitor interactions for quality and training purposes to enhance, modify, personalise or otherwise improve our services /communications for the benefit of our donors; and to better understand how people interact with our website.
- 7. Retain records and call recordings as evidence in the defence of a legal claim.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

### **Sensitive Personal Information**

Data protection law recognises some types of personal information as sensitive, such as details about your health, ethnicity, or religion, which require extra protection. We will only collect this information when there is a clear and lawful reason to do so. If you choose to share sensitive details with us - for example, when contacting our patient support services or sharing your personal experience - we will handle this information with extra care and confidentiality in line with this notice.

We may use this information to:

- Inform relevant authorities, such as emergency services or social services, should you disclose any information where there is the possibility of harm to yourself or another person this is a legal obligation.
- Respond to your enquiry and help us train, monitor, and evaluate our services
- Publish or share your story (for example, on our website or in fundraising or educational materials) only if you have given your explicit permission or have shared it publicly, such as through our social media channels
- Remove any identifiable details before sharing with third parties where necessary

Access to sensitive personal information is restricted to employees or contractors of AMR Action UK who need it to carry out their roles and who are bound by additional confidentiality agreements.

#### Your choices

You have a choice about whether you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do and the products you can buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting you in control of your data so you're free to change your marketing communication preferences (including telling us that you don't want to be contacted for marketing purposes) at any time:

Please email us at info@amr-action-uk.org or write to AMR Action UK, 167-169 Great Portland Street, 5th Floor, London,

W1W 5PF. Alternatively, you can telephone 07549 020999

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes; examples might be where we are processing a donation or thanking you for your participation in an event.

# **Your Rights**

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that we think apply:

#### **Right of Access**

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, contact us using our details below. Please be aware that we will ask you for proof of identity or alternative proof of authority before sharing any information we may hold.

#### Right to have your inaccurate personal data corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us so we're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or if you believe any of the other information we hold is inaccurate or out of date, please contact us at info@amr-action-uk.org or write to

AMR Action UK, 167-169 Great Portland Street-5th Floor, London, W1W 5PF. Alternatively, you can telephone 07549 020999

## Right to restrict use

You have a right to ask us to restrict the processing of some or all your personal information if there is disagreement about its accuracy, or we're not lawfully allowed to use it.

# Right of Erasure

You may ask us to delete some or all your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to. In many cases, we will anonymise that information, rather than delete it.

# Right for your personal data to be portable

If we are processing your personal information (1) based on your consent, or to enter or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

### **Right to Object**

You have the right to object to processing where we are using your personal information (1) based on legitimate interests, (2) for direct marketing or (3) for statistical/research purposes.

If you want to exercise any of the above rights, please email us at info@amr-action-uk.org. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office.

# Keeping your information safe

When you give us personal information, both offline and online, we take steps to ensure that appropriate technical and organisational controls are in place to protect it.

Any sensitive information (such as credit or debit card details) provided to us via our website is encrypted and protected with the following software: 128 Bit SSL encryption. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we will make our best effort to ensure its security on our systems.

# Keeping your information up to date

We take reasonable steps to ensure your information is accurate and up to date.

Where possible we use publicly available sources to identify deceased records or whether you have changed address. We would really appreciate it if you let us know when your contact details change.

# How long is your information kept for?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations, as well as best practice.

For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes).

Further reasons we may retain personal information include:

- For our auditing purposes
- Evidence in defence of a legal claim
- Ensuring you are suppressed from marketing if you prefer never to hear from us in the future.

We review our retention periods on a regular basis.

If you would like to know more about how long, we hold your personal data for – please email us at info@amr-action-uk.org

### **Use of 'Cookies'**

Our website uses cookies. Cookies are small files stored on your computer that help the site recognise you when you visit. For example, we might use them to remember your country preference so we can give you a more personalised experience and improve our services.

Our website may contain links to other websites run by other organisations. This notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access these from links on our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the privacy notice of that third-party site.

Any changes we may make to this notice in the future will be posted on our website so please check this page occasionally to ensure that you're happy with any changes. If we make any significant changes, we'll make this clear on our website.

#### **Vulnerable circumstances**

We are committed to protecting vulnerable supporters, customers, and volunteers, and appreciate that additional care may be needed when we use their personal information. In

recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

# Complaints

We welcome, and take seriously, all complaints and feedback about our work.

If you make a complaint to us, we will collect and use your information to respond to your concerns.

If your complaint relates to an area of our work where we employ a third-party processor or product provider, we may share your personal information with that third party to investigate your concerns. We will keep a record of your complaint for 7 years from the date that we deem the complaint closed.

You can complain to the ICO if you are unhappy with how we have used your data They can be contacted as follows:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113, ICO Website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a>

### Changes to this notice

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