

## GDPR BALANCING EXERCISE FOR DATA PROCESSING - FINANCE

This balancing exercise should be used to identify which activities we can carry out without obtaining consent.

| What activity are we assessing?   | What is our interest?  | What would the individual's reasonable expectations be?  | Do the individual's interests or rights (eg privacy rights) over-ride our interest?   | On balance, can we treat this as a 'legitimate interest'? |
|---|--|--|---|---|
| <p>Monthly Donor Recruitment – processing data. This involves the receiving of new donor data from the fundraising agency via secure file transfer protocol, (which is a standard technological way of transferring data between organisations).</p> <p>The data is then loaded on to Raiser's Edge (our secure database), so that BACS instructions can be issued to the bank and bi-monthly direct debit donation claims can be made</p>  | <ol style="list-style-type: none"> <li>1. To receive and process donor information in order to claim the regular gift that the donor has said they wish to make to the charity</li> </ol>  | <ol style="list-style-type: none"> <li>1. That the charity receives data from the fundraisers in order to process it onto a database to enable the administration of the recurring gift that they have permitted to be set up.</li> <li>2. That data will be handled sensitively and securely throughout the process.</li> </ol>   | <p>The charity only has the donors details because the donor has given them to the fundraiser of their own free will, for the purposes of making a recurring gift to the charity.</p> | <p>Legitimate Interest</p>                                |
| <p>Monthly donor recruitment – administration. This includes issuing the initial Advance Notification Letter (ANL) confirming the schedule of payments and advising the donor how they can cancel the donation, if they wish to. All regular givers receive this letter, irrespective of their marketing communications, as it is a legal requirement. It also includes the creation and submission of a bi-monthly BACS claim file in order for the charity to receive the recurring gift. It also includes the creation of monthly gift aid claim files which</p> | <ol style="list-style-type: none"> <li>1. To fulfil our legal obligations to our donors by providing the requisite ANL confirmation of their donation via direct debit.</li> <li>2. To fulfil the donors request that we claim a recurring gift direct from their bank account, providing valuable income for the charity.</li> <li>3. To ensure that the charity is able to claim Gift Aid, where a donor has confirmed their eligibility for Gift Aid and their desire that the charity should claim it in relation to their gift. This provides valuable</li> </ol> | <ol style="list-style-type: none"> <li>1. That the charity would issue an ANL confirming the details of their recurring donation and the schedule of payments.</li> <li>2. That the charity would proceed to take a recurring gift from their bank accounts, as per the schedule set out in the ANL</li> <li>3. That, where the donor has instructed them to do so, the charity would claim Gift Aid on their recurring gift.</li> </ol> | <p>The charity is acting in accordance with the donor's mandated wishes.</p>  | <p>Legitimate interest</p>                                |

|  |  |   |   |                            |
|--|--|---|---|----------------------------|
| <p>are issued to HMRC in order to receive Gift Aid on eligible donations</p>   | <p>additional income for the charity.</p>  |   |   |                            |
| <p>Monthly donor recruitment – direct marketing. Donors are asked to “opt-in” to their preferred communication method at the point of sign up.</p> | <ol style="list-style-type: none"> <li>1. To keep donors updated with the charity’s research and information activities in order to keep the donor engaged, reassure them that their gift is being put to good use and make sure they understand that the charity is grateful for their gift.</li> <li>2. To encourage donors to make further donations/ participate in fundraising activities.</li> </ol> | <ol style="list-style-type: none"> <li>1. That the charity will comply with GDPR requirements, such as: <ul style="list-style-type: none"> <li>- That the charity would only communicate with the individual via methods that the donor had agreed to.</li> <li>- That they would be able to unsubscribe easily.</li> <li>- That they would not receive such communications if they hadn’t “opted in”</li> <li>- That they won’t receive information of a type that they had not agreed to (e.g receiving a fundraising ask if they had only indicated an interest in research findings)</li> </ul> </li> </ol> | <p>The charity only has the right to communicate with the donor for any purpose other than administrative ones if the donor has knowingly given their consent.</p>        | <p>Permission required</p> |
| <p>Telemarketing, postal or email upgrade/ reactivation campaigns</p>  | <ol style="list-style-type: none"> <li>1. The charity would like to maximise its income by encouraging existing donors to increase their recurring gift, or encouraging lapsed donors to recommence donations</li> </ol>   | <ol style="list-style-type: none"> <li>1. That they will not receive such a call unless they had: <ul style="list-style-type: none"> <li>- been clearly told that it was the charity’s policy and that that’s how their data would be used</li> <li>- they had been given an opportunity to opt-in/ opt-out of this use of their data</li> <li>- they had supplied a valid phone number or address</li> </ul> </li> </ol>   | <p>The charity only has the right to pursue such a campaign with those donors who have given their permission to be contacted for this purpose, through each channel.</p> | <p>Permission required</p> |