

GDPR BALANCING EXERCISE FOR DATA PROCESSING – TRUSTS AND MAJOR GIFTS

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>Prospect research into potential major donors and trustees of charitable trusts, and creating short profiles based on:</p> <ul style="list-style-type: none"> • publicly available, freely given information that we find via reliable online sources • Tommy's own donor records • Potential connections with Tommy's Trustees, volunteers and staff 	<ol style="list-style-type: none"> 1. To identify if an individual or trust may be interested and has the capacity to give a major gift to Tommy's 2. To identify how best to approach them 3. To avoid unwanted and inappropriate approaches 	<p>If they have any sort of public profile, they would expect us to know basic details about them i.e.:</p> <ul style="list-style-type: none"> • occupation/source of wealth • major professional achievements • details of past philanthropy or volunteering that is in the public domain • any freely given history of pregnancy complications that is in the public domain or previously disclosed to Tommy's • if they have personal or professional connections to other high-profile people e.g. if their spouse is a famous artist or runs a business <p>If they do not have a public profile – e.g. they are a Trustee of a small local grant-giving trust, then they would not expect it.</p>	<p>No, because the information we are gathering (as described in the previous column) is something they would reasonably expect us to know. Not knowing it could cause offence or distress, and would be more likely to result in inappropriate approaches.</p> <p>We will make sure we state the source of all information we gather so we can prove it was obtained fairly and lawfully.</p> <p>Where this information is not freely available online (e.g. because the person has no public profile) we will simply state in our research: 'Little information available'.</p> <p>We will not gather any data that could be viewed as personal or sensitive (other than freely given information about pregnancy complications as previously described)</p>	<p>Yes</p>

<p>Identifying individual donors who have given to Tommy's in the past and contacting them for the following reasons:</p> <ul style="list-style-type: none"> to ask for further support to invite them to an event to provide a report on how we have used their donations, or Tommy's wider work 	<p>To identify whether a past donor may be interested in supporting us again – people who have previously given are statistically more likely to support the same charity again.</p>	<p>That we may contact them by post, email and phone only if we have consent.</p>	<p>Yes</p>	<p>No</p>
<p>Contacting charitable trusts for the following reasons:</p> <ul style="list-style-type: none"> to ask for further support to invite them to an event to provide a report on how we have used their donations, or Tommy's wider work 	<p>To identify charitable trusts that may be interested in supporting Tommy's.</p> <p>To maintain long-term, mutually beneficial relationships that result in sustainable income for Tommy's.</p>	<p>That a reasonable level of contact is expected unless specifically prohibited by the Trust's guidelines. Individuals who act as the trustees or employees of charitable trusts, or have a charitable trust as the vehicle for their giving, would expect this contact as part of their role.</p>	<p>No – this contact can be classed as admin.</p>	<p>Yes</p>
<p>Reviewing lists of individuals who have signed up to Tommy's fundraising events, and opted in to communications.</p> <p>The purpose of this is to identify those who may give more if they receive a more personalised approach. These reviews will be based on the criteria laid out in our privacy policy, such as:</p> <ul style="list-style-type: none"> Reason for giving Job title and employer Family name (if well known) Postcode <p>We may use this information to identify who to invite to an event or meeting.</p>	<p>To identify whether these individuals may have the interest and capacity to give a major gift, if we look after them in the right way.</p>	<p>That if they had opted in to marketing communications, we would review the information as outlined in our Privacy Policy (which is readily available to them at the point at which they are selecting whether to opt in), and use this to tailor how we communicate with them.</p>	<p>No – because they have already opted in</p>	<p>n/a – we will already have consent</p>

<p>Communications with a donor who has sent a significant unsolicited gift via the website (ie £1k+) and has not indicated that they want to receive communications by phone/email.</p> <p>To identify whether it is reasonable to update these individuals with an annual impact report following their donation, and if appropriate invite them to T&MG special events.</p>	<p>To ensure these individuals feel appreciated and valued beyond an immediate thank you letter.</p> <p>To identify whether there might be an opportunity for a longer term relationship, in whether they'd be interested in learning more about Tommy's on a bespoke basis – ultimately so we establish whether they might continue to support Tommy's with repeat major gifts, if we look after them in the right way.</p>	<p>Not to receive any general marketing or communications, only to receive bespoke communications by post from the CEO or T&MG team and not to explicitly be asked for further donations until such point as a personal relationship has been established.</p>	<p>No - but we believe individuals may opt out of comms on the website in order to avoid being added to a general mailing list. They may not realise that for a gift of this size the charity has an individual stewardship programme for each donor, and they would only receive infrequent tailored comms by post.</p>	<p>Yes - Legitimate interest cannot be used to justify email marketing activity, but can be used to justify occasional, bespoke communication via post.</p>
<p>Communications with a donor following a Tommy's event.</p> <p>To identify whether it is reasonable to contact these guests afterwards, even if they were invited by a third party, to encourage them to meet for further discussions or come on a centre visit.</p>	<p>To identify whether there might be an opportunity for a longer term relationship, in whether they'd be interested in learning more about Tommy's on a bespoke basis – ultimately so we establish whether they might continue to support Tommy's with repeat major gifts, if we look after them in the right way.</p>	<p>To be thanked for attending, receive photos if applicable, but not to receive any general marketing or communications, only to receive bespoke communications from the CEO or T&MG team and not to explicitly be asked for further donations until such point as a personal relationship has been established.</p>	<p>No - the individual has enjoyed Tommy's hospitality and therefore it would seem reasonable to permit appropriate follow up. The individuals may at any time opt out of comms as every email has a footer encouraging them to unsubscribe if they wish.</p>	<p>Yes - Legitimate interest cannot be used to justify email marketing activity, but can be used to justify occasional, bespoke communication. If the individual advises they are not interested in meeting or a centre visit after 2-3 approaches we would mark them as 'inactive prospects' and discontinue communications.</p>